

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

LOUIS VUITTON MALLETIER S.A.S.,

Plaintiff,

v.

WESTGATE DISCOUNT MALL INC.,  
BASIROU KEBBAY, and AARON KEBE  
a/k/a AARON KEBBEH a/k/a AARON  
KEBBAH

Defendants.

CIVIL ACTION NO:

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**COMPLAINT**

COMES NOW Plaintiff LOUIS VUITTON MALLETIER S.A.S. (hereinafter “Louis Vuitton”), by and through its undersigned counsel, and hereby sues Defendants Westgate Discount Mall, Inc., Basirou Kebbay, and Aaron Kebe a/k/a Aaron Kebbeh a/k/a Aaron Kebbah (hereinafter collectively, “Defendants”) and alleges:

**NATURE OF ACTION**

1. This is an action for, *inter alia*, contributory trademark infringement under federal law. The Defendants, individually and/or collectively, own, operate, control and manage a well-known indoor flea market in Atlanta, Georgia called

“Westgate Discount Mall” (hereinafter “Market”) located at 3131 Campbellton Road, SW, Atlanta, Georgia. As described more fully herein, the size and scale of trademark counterfeiting that has taken place at the Market, and at the direction and control of Defendants Kebbay and Kebe, is staggering.

2. By and through their actions, Defendants have created a safe haven for the sale of counterfeit Louis Vuitton merchandise, as well as a host of other well-known brands. Defendants have provided space to a host of individuals and businesses at the Market (collectively, “Tenants”) that Defendants knew or had reason to know were selling and/or offering for sale goods and merchandise bearing counterfeits of Louis Vuitton’s federally registered trademarks. Despite being repeatedly notified that counterfeit Louis Vuitton merchandise was being offered for sale and sold by their Tenants, Defendants turned a blind-eye to this activity. In so doing, Defendants allowed the sale of such merchandise to flourish on a massive scale to the detriment of Louis Vuitton.

### **PARTIES**

3. Louis Vuitton is a *société par actions simplifiées* duly organized and existing under the laws of France with a principal place of business at 2 rue du Pont Neuf, Paris, France. Louis Vuitton is engaged, *inter alia*, in the manufacture, importation, sale and distribution in interstate and foreign commerce, including within this judicial district, of prestigious luxury merchandise including, without

limitation, handbags, luggage, apparel, shoes, scarves, jewelry, watches, and other fashion accessories bearing one or more of Louis Vuitton's federally registered trademarks (hereinafter collectively, "Louis Vuitton Products"). Louis Vuitton maintains a retail shop within this judicial district at Lenox Square located at 3393 Peachtree Road, Atlanta, Georgia, 30326.

4. Louis Vuitton is the sole and exclusive distributor in the United States of Louis Vuitton Products.

5. Upon information and belief, Defendant Westgate Discount Mall Inc. (hereinafter "Westgate") is a corporation organized and existing under the laws of the State of Georgia with its principal place of business at 3131 Campbellton Road, SW, Atlanta, Georgia 30311.

6. Upon information and belief, Defendant Kebbay owns the Market and resides at 35703 16th Avenue S, Apartment G101, Federal Way, Washington 98003.

7. Upon information and belief, Defendant Kebe is the Chief Executive Officer, Chief Financial Officer, Secretary, and registered agent of Defendant Westgate and resides at 1388 Bubbling Creek Road NE, Brookhaven, Georgia 30319.

#### **JURISDICTION AND VENUE**

8. The claim herein arises under the provisions of the Trademark Act of 1946, 15 U.S.C. § 1051, *et seq.* for contributory infringement of trademarks

registered with the United States Patent and Trademark Office (“USPTO”).

9. This Court has original jurisdiction over the subject matter of this action pursuant to 15 U.S.C. § 1121, and 28 U.S.C. §§ 1331, 1332 and 1338.

10. This Court has personal jurisdiction over Defendants because Defendants: (a) are incorporated in and/or reside in this District and the State of Georgia; (b) conduct business in this District and the State of Georgia and are otherwise purposefully, systematically and continuously engaged in substantial and not isolated activities in this District and the State of Georgia, and (c) the vast majority of the conduct complained of herein occurred in this District and the State of Georgia. Furthermore, Defendants’ liability to Louis Vuitton arises from, and/or is related to, Defendants’ activities within this District and the State of Georgia.

11. This Court has personal jurisdiction over Defendants Kebbay and Kebe. Defendants Kebbay and Kebe are the moving, active and conscious forces behind the Market’s infringement of Louis Vuitton’s federally registered trademarks, as alleged herein.

12. Personal jurisdiction over the corporate and each of the individual Defendants is therefore proper in this judicial district.

13. Venue is proper pursuant to 28 U.S.C. § 1391 because a substantial part of the events giving rise to the claims occurred in this district.

## **FACTUAL ALLEGATIONS**

### **A. Louis Vuitton and the Louis Vuitton Trademarks**

14. Since its founding in 1854 in Paris as a luggage and trunks business, Louis Vuitton has grown into one of the world's premiere fashion houses, known for its high-quality handbags, luggage, scarves, jewelry, watches and many other fashion and luxury goods.

15. To protect and maintain the image of the brand, Louis Vuitton Products are sold exclusively through company-owned and operated boutiques, some of which are located within high-end retail stores such as Neiman Marcus and Saks Fifth Avenue, through the Louis Vuitton website at <http://us.louisvuitton.com>, and through the website of its related company, Le Bon Marché, at <http://www.24s.com>.

16. Louis Vuitton is the owner of numerous famous federally-registered trademarks, including, but not limited to, the LOUIS VUITTON and LOUIS VUITTON-formative word marks, the Toile Monogram Design mark, the LV Logo Design mark, the Stylized Flower Design marks, the Damier Design mark, the Epi Design mark, and the S-Lock Design mark (collectively, the "Louis Vuitton Trademarks"), which are federally registered for use in conjunction with a variety of goods, including, *inter alia*, handbags, accessories, and apparel.

17. Representative samples of the Louis Vuitton Trademarks, which are each registered with the USPTO, are listed in the table below, and true and correct

copies of the U.S. registration certificates for these Louis Vuitton Trademarks are attached hereto as Exhibit A:

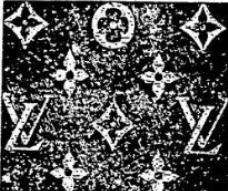
Mark	Reg. No.	Reg. Date	Class & Goods/Services
<b><i>The LOUIS VUITTON and LOUIS VUITTON-formative Word Marks</i></b>			
LOUIS VUITTON	1,045,932	08/10/1976	Class 18: Luggage and ladies' handbags
LOUIS VUITTON	1,990,760	08/06/1996	<p>Class 14: Watches and straps for wrist watches</p> <p>Class 18: Trunks; traveling trunks; suitcases; traveling bags; luggage; garment bags for travel; hat boxes for travel; shoe bags for travel; umbrellas; animal carriers; rucksacks; haversacks; leather or textile shopping bags; beach bags; handbags; vanity cases sold empty; attaché cases; tote bags, travel satchels; clutch bags; briefcases; wallets; pocket wallets; credit card cases; business card cases; bill and card holders; checkbook holders; key cases; change purses; briefcase-type portfolios</p> <p>Class 25: Shirts; sweatshirts; polo shirts; T-shirts; headwear; jackets; ties; belts; shawls; scarves</p>
LOUIS VUITTON	2,904,197	11/23/2004	Class 14: Jewelry, namely, rings, earrings, cuff links, bracelets, charms, necklaces, horological and chronometric instruments, namely, watches, wrist-watches, straps for wrist-watches and watch cases
LOUIS VUITTON	2,909,003	12/07/2004	Class 9: Optical instruments and apparatus, namely, spectacles, eyeglasses, spectacle cases

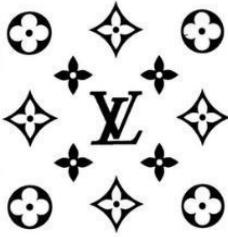
<b>Mark</b>	<b>Reg. No.</b>	<b>Reg. Date</b>	<b>Class &amp; Goods/Services</b>
LOUIS VUITTON	4,530,921	05/13/2014	<p>Class 9: Sunglasses; accessories for telephones, mobile phones, smart phones, namely, covers, neck straps, neck cords, and bags and cases specially adapted for holding or carrying portable telephones and telephone equipment and accessories</p> <p>Class 16: Paper bags; boxes of cardboard or paper; posters; postcards; catalogs featuring luggage, travel accessories, bags, small leather goods, and clothing; printed publications, namely, books and magazines featuring luggage, travel accessories, purses, small leather goods, and clothing; photograph albums; stationery, namely, note pads, note books; diaries; office requisites, namely, paper weights, pencil holders, pen holders, pen cases</p> <p>Class 25: Clothing, namely, pullovers, vests, shirts, tee-shirts, trousers, jackets, suits, coats, rain coats, waterproof jackets, overcoats, parkas, skirts, dresses, pajamas, gloves, neck ties, belts for clothing, leather belts, scarves, pocket squares, sashes for wear, shawls, stoles, bathing suits; headwear; shoes; slippers; boots; half-boots</p>
LOUIS VUITTON	6,855,032	09/27/2022	Class 10: Sanitary face coverings in the nature of protective face shields for protection against viral infection; protective masks, namely, reusable sanitary masks for protection against viral infection; protective chin shields specially adapted for placement underneath sanitary masks for

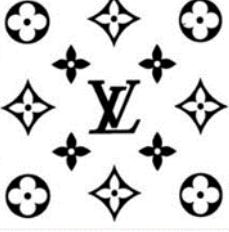
Mark	Reg. No.	Reg. Date	Class & Goods/Services
			protection against viral infection; protective gloves, namely, sanitary gloves for protection against viral infection; face masks for medical use; surgical masks; protective face shields for medical use; protective chin shields for medical use; gloves for medical use
LOUIS VUITTON PARIS	2,346,373	05/02/2000	Class 14: Jewelry, namely, rings, belt buckles, cufflinks, bracelets, charms, brooches, necklaces, horological instruments, watches, cases for watches Class 18: Travelling bags, handbags, shoulder bags, pouches, fine leather goods, pocket wallets, purses, key cases, card holders, checkbook holders Class 25: Clothing and underwear, scarves, clothing belts
	1,615,681	10/02/1990	Class 18: Traveling bags, hand bags, wallets, passport cases, key cases, credit card cases, business card cases, change purses
<i>The LV Logo Design</i>			
	1,519,828	01/10/1989	Class 18: Trunks, valises, traveling bags, satchels, hat boxes and shoe boxes used for luggage, hand bags, pocketbooks
	1,794,905	09/28/1993	Class 25: Clothing for men and women; namely belts, shawls, sashes, scarves; footwear, headgear
	1,938,808	11/28/1995	Class 14: Jewelry, watches and straps for wrist watches Class 24: Travel blankets made of textile

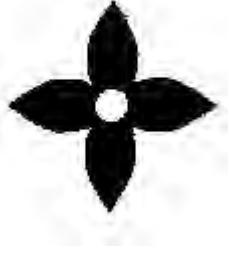
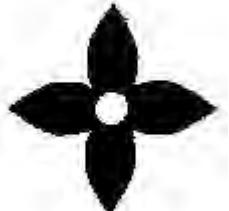
Mark	Reg. No.	Reg. Date	Class & Goods/Services
	2,361,695	06/27/2000	Class 25: Clothing, namely, sweaters, shirts, sweatshirts, polo shirts, t-shirts, suits, waistcoats, raincoats, skirts, coats, pullovers, trousers, dresses, jackets, shawls, stoles, scarves, neckties, pocket squares, gloves, ties, belts, bathing suits, shoes, boots, sandals, hats
	2,909,002	12/07/2004	Class 9: Optical instruments and apparatus, namely, spectacles, eyeglasses, spectacle cases
	4,614,736	09/30/2014	Class 9: Sunglasses; spectacle cases; accessories for telephones, mobile phones, smart phones, tablet devices, PDAs, and MP3 players, namely, covers, neck straps, neck cords, and bags and cases specially adapted for holding or carrying portable telephones and telephone equipment and accessories  Class 16: Pamphlets referring to travel; postcards; catalogs featuring luggage, travel accessories, bags, small leather goods, and clothing; invitation cards; printed publications, namely, books and magazines featuring luggage, travel accessories, purses, small leather goods, and clothing; photograph albums; stationery, namely, note pads, writing pads, envelopes, note paper; calendars; pocket calendars; note books; diaries; office requisites, namely, paper weights, pencil holders, pen holders, pen cases  Class 26: Buttons; shoe buckles; hair accessories, namely, barrettes, hair

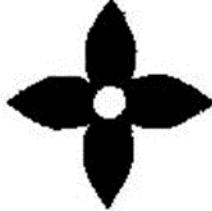
Mark	Reg. No.	Reg. Date	Class & Goods/Services
			clips, hair bands, hair wraps; hair ornaments; brooches for clothing; clothing fasteners, namely, scarf holders
	6,874,886	10/18/2022	Class 10: Face shields for protection against viral infection; fashion face masks being sanitary masks for protection against viral infection; face coverings incorporating protective chin shields being sanitary masks for protection against viral infection; protective gloves for medical use; Face masks for medical use; Surgical masks; protective face shields for medical use; protective chin shields for medical use; gloves for medical use
	5,477,535	05/29/2018	Class 14: Jewelry; fashion jewelry, especially precious or semi-precious stones, pearls, rings, earrings, cuff links, bracelets, charms, brooches, necklaces, pendants, key rings of precious metal, tie pins, medallions, jewelry rolls for travel; jewelry boxes; trophies of precious metal; timepieces, watches, wristwatches, watch straps, alarm clocks, stop watches, clock and watch making pendulums and cases or presentation cases for timepieces Class 18: Boxes of leather or imitation leather; travel bags, travel sets, namely, leather travel bags, trunks and suitcases, garment travel bags for footwear; unfitted vanity cases; backpacks, handbags; sports bags; evening bags, namely, clutch bags, attaché cases and briefcases of leather;

Mark	Reg. No.	Reg. Date	Class & Goods/Services
			wallets, purses, card wallets, key cases of leather; parasols, umbrellas Class 25: Clothing, namely, pullovers, vests, shirts, tee-shirts, trousers, jackets, suits, coats, raincoats, overcoats, parkas, skirts, dresses; pajamas, house coats, night shirts, dressing gowns; clothing accessories, namely, hats, caps, bonnets, gloves, neckties, belts, leather belts, scarves, pocket squares, shawls, stockings, socks, tights, suspenders, stoles; underwear, lingerie; bathing suits; footwear, slippers, boots and half-boots
	286,345	08/25/1931	Class 18: Trunks, valises, traveling bags, hat boxes and shoe boxes used for luggage, hand bags, pocketbooks.
<i>The Toile Monogram Design</i>			
	297,594	09/20/1932	Class 18: Trunks, valises, traveling bags, satchels, hat boxes and shoe boxes used for luggage, hand bags, and pocketbooks
	1,770,131	05/11/1993	Class 25: Clothing for men and women, namely, shawls, sashes, scarves; headgear

Mark	Reg. No.	Reg. Date	Class & Goods/Services
	2,399,161	10/31/2000	Class 25: Clothing and underwear, namely, shirts, polo shirts, t-shirts, waistcoats, raincoats, skirts, coats, trousers, dresses, jackets, shawls, stoles, scarves, neckties, gloves, ties, belts, bathing suits, shoes, boots, sandals, hats
	4,192,541	08/21/2012	Class 9: Sunglasses; spectacles; optical lenses; spectacle cases; accessories for telephones, mobile telephones, smart phones, PC tablets, personal digital assistants, and MP3 players, namely, hands-free kits for telephones, covers, housings, façades, hand straps, and neck straps Class 14: Jewelry; key rings of precious metal; tie pins; medallions; jewelry boxes; watches; watch bands; alarm clocks; cases for timepieces Class 16: Printed matter, namely, pamphlets, catalogs, and books in the field of travel, luggage, luxury goods, fashion, clothing, sports, the arts; publications, namely, brochures and booklets in the field of travel, luggage, luxury goods, fashion, clothing, sports, the arts; stationery; stationery articles, namely, note pads, writing books, drawing books, agendas, notebooks, envelopes, letter paper, covers for diaries, indexes, and pads; office requisites, namely, letter trays, pencil holders, pen holders, writing pads, pens, balls, and nibs for pens; postcards; printed documents, namely, printed certificates

Mark	Reg. No.	Reg. Date	Class & Goods/Services
			<p>Class 18: Boxes of leather or imitation leather for packaging and carrying goods; traveling bags; leather traveling sets of luggage; trunks; suitcases; garment bags for travel; vanity cases sold empty; toiletry bags sold empty; backpacks; handbags; attaché cases; leather document cases; wallets; purses; leather key cases</p> <p>Class 24: Textiles and textile goods, namely, bath linen, bed linen, towels, bed covers</p> <p>Class 25: Clothing, namely, underwear, shirts, tee-shirts, pullovers, skirts, dresses, trousers, coats, jackets, belts for clothing, scarves, sashes for wear, gloves, neckties, socks, bathing suits; footwear; headwear</p> <p>Class 34: Cigar and cigarette cases of leather and imitation leather</p>
	6,874,887	10/18/2022	<p>Class 10: Face shields for protection against viral infection; fashion face masks being sanitary masks for protection against viral infection; face coverings incorporating protective chin shields being sanitary masks for protection against viral infection; protective gloves for medical use; Face masks for medical use; Surgical masks; protective face shields for medical use; protective chin shields for medical use; gloves for medical use</p>

Mark	Reg. No.	Reg. Date	Class & Goods/Services
<i>The Stylized Flower Designs</i>			
	2,177,828	08/04/1998	<p>Class 14: Goods made of precious metals, namely, shoe ornaments, ornamental pins; jewelry, namely, rings, earrings, cufflinks, bracelets, charms, necklaces; horological instruments, straps for watches, watches and wristwatches, cases for watches</p> <p>Class 18: Goods made of leather or imitations of leather are not included in other classes, namely, boxes made from leather; trunks, valises, traveling bags, luggage for travel, garment bags for travel, vanity cases sold empty, rucksacks, hand bags, beach bags, shopping bags, shoulder bags, attaché cases, briefcases, and fine leather goods, namely, pocket wallets, purses, leather key holders, business card cases, calling card cases, and credit card cases, umbrellas</p> <p>Class 25: Clothing and underwear, namely, shawls, stoles, belts, shoes, boots, sandals</p>
	3,021,231	11/29/2005	Class 9: Spectacles, sunglasses and spectacle cases

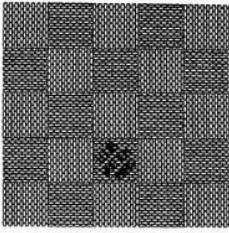
Mark	Reg. No.	Reg. Date	Class & Goods/Services
	6,952,203	01/17/2023	Class 9: Eyewear; sunglasses; spectacles; spectacle frames; spectacle lenses; spectacle cords; spectacle cases; containers for contact lenses; sleeves for laptops; bags adapted for laptops; covers for smartphones; cases for smartphones; Hand grips, rings and stands adapted for smartphones, all the foregoing being holders specifically adapted for smartphones; mouse pads; binoculars; apparatus and instruments for recording, transmitting, reproducing or processing of sound or images; loudspeakers; headphones; earphones; hands-free kits for telephones; smartwatches; downloadable computer software applications for providing information in the fields of shoes, body and air fragrances, cosmetics, leather goods, handbags, luggage, trunks, product restoration, jewelry, watchmaking, connected devices, ready to wear, fashion accessories, fashion and culture, exhibitions, books, note books, periodicals, home furniture; downloadable computer software applications for displaying products in the fields of shoes, body and air fragrances, cosmetics, leather goods, handbags, luggage, trunks, jewelry, watchmaking, connected devices, ready to wear, fashion accessories, fashion, books, note books, periodicals, home furniture; blank USB flash drives; portable media players; downloadable graphics for mobile

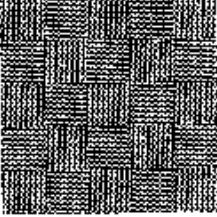
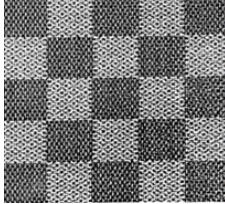
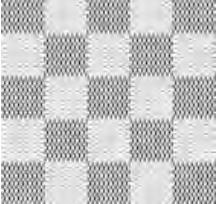
Mark	Reg. No.	Reg. Date	Class & Goods/Services
			<p>phones; downloadable emoticons for mobile phones</p> <p>Class 10: Protective face shields for medical use; protective face shields in the nature of protective face masks for medical use; protective face shields in the nature of protective masks being face masks for protection against viral infection; protective face shields being face shields for protection against viral infection</p>
	2,181,753	08/18/1998	<p>Class 14: Jewelry, namely, rings, earrings, bracelets, charms, necklaces, horological instruments, straps for watches, watches and wristwatches, cases for watches</p> <p>Class 18: Goods made of leather or imitations of leather are not included in other classes, namely, boxes made from leather; trunks, valises, traveling bags, luggage for travel, garment bags for travel, vanity cases sold empty, rucksacks, hand bags, beach bags, shopping bags, shoulder bags, attaché cases, briefcases, and fine leather goods, namely, pocket wallets, purses, leather key holders, business card cases, calling card cases, credit card cases, and umbrellas</p> <p>Class 25: Clothing and underwear, namely, shirts, waistcoats, raincoats, skirts, coats, pullovers, trousers, dresses, jackets, shawls, stoles, scarves, neckties, pocket squares, belts, shoes, boots, sandals</p>

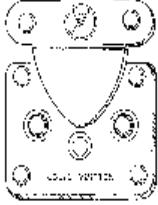
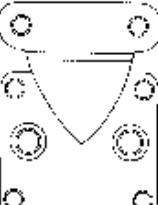
Mark	Reg. No.	Reg. Date	Class & Goods/Services
	3,023,930	12/6/2005	Class 9: Spectacles, sunglasses and spectacle cases
	6,952,204	01/17/2023	Class 9: Eyewear; sunglasses; spectacles; spectacle frames; spectacle lenses; spectacle cords; spectacle cases; containers for contact lenses; sleeves for laptops; bags adapted for laptops; covers for smartphones; cases for smartphones; Hand grips, rings and stands adapted for smartphones, all the foregoing being holders specifically adapted for smartphones; mouse pads; binoculars; apparatus and instruments for recording, transmitting, reproducing or processing of sound or images; loudspeakers; headphones; earphones; hands-free kits for telephones; smartwatches; downloadable computer software applications for providing information in the fields of shoes, body and air fragrances, cosmetics, leather goods, handbags, luggage, trunks, product restoration, jewelry, watchmaking, connected devices, ready to wear, fashion accessories, fashion and culture, exhibitions, books, note books, periodicals, home furniture; downloadable computer software applications for displaying products in the fields of shoes, body and air fragrances, cosmetics, leather goods, handbags, luggage, trunks, jewelry, watchmaking, connected devices,

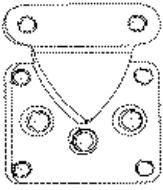
Mark	Reg. No.	Reg. Date	Class & Goods/Services
			<p>ready to wear, fashion accessories, fashion, books, note books, periodicals, home furniture; blank USB flash drives; portable media players; downloadable graphics for mobile phones; downloadable emoticons for mobile phones</p> <p>Class 10: Protective face shields for medical use; protective face shields in the nature of protective face masks for medical use; protective face shields in the nature of protective masks being face masks for protection against viral infection; protective face shields being face shields for protection against viral infection</p>
	2,773,107	10/14/2003	<p>Class 14: Jewelry including cuff links, bracelets, necklaces, horological and chronometric instruments and apparatus, namely, watches</p> <p>Class 18: Travel bags, travel bags made of leather; luggage trunks and valises, garment bags for travel, vanity-cases sold empty; rucksacks, shoulder bags, handbags; attaché-cases, briefcases, drawstring pouches, pocket wallets, purses, umbrellas, business card cases made of leather or of imitation leather, credit card cases made of leather or of imitation leather</p> <p>Class 25: Clothing, namely, shirts, T-shirts, belts, scarves, neck ties, shawls, raincoats, overcoats, high-heeled shoes, low-heeled shoes, boots, tennis shoes</p>

Mark	Reg. No.	Reg. Date	Class & Goods/Services
	3,051,235	01/24/2006	Class 9: Spectacles, sunglasses and spectacle cases
	6,976,619	02/14/2023	Class 9: Eyewear; sunglasses; spectacles; spectacle frames; spectacle lenses; spectacle cords; spectacle cases; containers for contact lenses; sleeves for laptops; bags adapted for laptops; covers for smartphones; cases for smartphones; Hand grips, rings and stands adapted for smartphones, all the foregoing being holders specifically adapted for smartphones; mouse pads; binoculars; apparatus and instruments for recording, transmitting, reproducing or processing of sound or images; loudspeakers; headphones; earphones; hands-free kits for telephones; smartwatches; downloadable computer software applications for providing information in the fields of shoes, body and air fragrances, cosmetics, leather goods, handbags, luggage, trunks, product restoration, jewelry, watchmaking, connected devices, ready to wear, fashion accessories, fashion and culture, exhibitions, books, note books, periodicals, home furniture; downloadable computer software applications for displaying products in the fields of shoes, body and air fragrances, cosmetics, leather goods, handbags, luggage, trunks, jewelry, watchmaking, connected devices, ready to wear, fashion accessories,

Mark	Reg. No.	Reg. Date	Class & Goods/Services
			<p>fashion, books, note books, periodicals, home furniture; blank USB flash drives; portable media players; downloadable graphics for mobile phones; downloadable emoticons for mobile phones</p> <p>Class 10: Protective face shields for medical use; protective face shields in the nature of protective face masks for medical use; protective face shields in the nature of protective masks being face masks for protection against viral infection; protective face shields being face shields for protection against viral infection</p>
<i><b>The Damier Design</b></i>			
	2,255,321	06/22/1999	Class 25: Clothing and other garments, namely, sweaters, coats, jackets, ties, clothing belts, footwear
	2,378,388	08/22/2000	Class 18: Goods made of leather or imitations of leather not included in other classes, namely, boxes of leather principally used for travel purposes, trunks, valises, traveling bags, handbags, beach bags, shopping bags, shoulder bags, brief cases, pouches, fine leather goods namely, pocket wallets, purses, key cases, business card cases, credit card cases

Mark	Reg. No.	Reg. Date	Class & Goods/Services
	2,421,618	01/16/2001	Class 18: Goods made of leather or imitations of leather not included in other classes, namely, valises, traveling bags, traveling sets for containing cosmetics, handbags, shopping bags, shoulder bags, brief cases, pouches; fine leather goods, namely, pocket wallets, purses, key cases, business card cases, credit card cases
	3,576,404	02/17/2009	Class 18: Boxes of leather or imitation leather for packaging and carrying goods, trunks, suitcases, traveling sets comprised of matching luggage, traveling bags, luggage, garment bags for travel, toiletry cases sold empty, rucksacks, satchels, handbags, beach bags, leather shopping bags, sling bags, suit carriers, shoulder bags, waist bags, purses, travel cases, briefcases, briefcase-type portfolios, leather pouches, wallets, change purses, key cases, business card cases, calling card cases
	4,809,157	09/08/2015	Class 9: Eyewear, namely, eyeglasses, eyeglass frames, sunglasses, sunglass frames; fitted cases and protective covers for mobile phones, laptops, tablet computers, bags and cases specially adapted for holding or carrying mobile phones and mobile phone accessories, laptops, tablet computers
	6,836,091	09/06/2022	Class 18: Boxes of leather or imitation leather; travelling bags; leatherware in the nature of travelling bag sets; trunks being luggage; garment bags for travel purposes for clothes and shoes; vanity

Mark	Reg. No.	Reg. Date	Class & Goods/Services
			cases, not fitted; rucksacks; handbags; sport bags; attaché cases made of leather; briefcases made of leather; pocket wallets; wallets; change purses; business card cases; leatherware in the nature of key cases; parasols; umbrellas; pet clothing; bags for carrying animals
	6,836,090	09/06/2022	Class 18: Boxes of leather or imitation leather; travelling bags; leatherware in the nature of travelling bag sets; trunks being luggage and suitcases; garment bags for travel purposes for clothes and shoes; vanity cases, not fitted; rucksacks; handbags; sport bags; clutches in the nature of evening purses; attaché cases made of leather; briefcases made of leather; pocket wallets; wallets; change purses; business card cases; leatherware in the nature of key cases; parasols; umbrellas; pet clothing; bags for carrying animals
<b><i>The S-Lock Design</i></b>			
	1,650,162	07/09/1991	Class 18: Leather and imitation leather products, namely, hand bags
	3,066,114	03/07/2006	Class 9: Sunglasses Class 18: Leather and imitation leather products, namely, handbags and purses

Mark	Reg. No.	Reg. Date	Class & Goods/Services
	3,617,909	05/12/2009	Class 18: Leather and imitation leather products, namely, toiletry cases sold empty, handbags

18. The above-referenced trademark registrations are owned by Louis Vuitton, are valid, subsisting, and in full force and effect, and are registered on the Principal Register of the USPTO. Many of the registrations issued long prior to the acts of Defendants complained of herein. Further, with the exception of U.S. Trademark Reg. Nos. 6,836,090, 6,836,091, 6,855,032, 6,874,886, 6,874,887, 6,952,203, 6,952,204, and 6,976,619, these registrations have become incontestable pursuant to 15 U.S.C. § 1065.

19. Louis Vuitton has invested millions of dollars and decades of time and effort to create consumer recognition in the Louis Vuitton Trademarks and to ensure that the public, not only in the United States but throughout the world, associates the Louis Vuitton Trademarks with high quality luxury goods emanating exclusively from Louis Vuitton.

20. As a result of Louis Vuitton's efforts, millions of consumers have been exposed to the Louis Vuitton Trademarks through advertising campaigns, in mainstream and fashion magazines and other periodicals, as depicted on television

and in motion pictures, in songs, on the Internet and social media, and in other forms of unsolicited media coverage.

21. Louis Vuitton has developed a worldwide reputation for high quality luxury goods and the public has come to exclusively and immediately identify products bearing the Louis Vuitton Trademarks with a single source—Louis Vuitton. Accordingly, each of the Louis Vuitton Trademarks, and the goodwill associated therewith, are of inestimable value to Louis Vuitton.

#### **B. Defendants' Unlawful Conduct**

22. At all times relevant to this action, Defendants collectively owned, operated, supervised, managed, and controlled the Market.

23. Upon information and belief, Defendants provide all services necessary for their Tenants to operate at the Market. Among other things, the Tenants at the Market are provided with basic requirements such as space, security, parking, maintenance of the Market's grounds (including cleaning and repair), and restrooms. Moreover, Defendants have advertised and promoted the Market, and have worked to attract customers to the Market.

24. Upon information and belief, Defendants have the right and ability to control their Tenants and/or the use of the space supplied to the Tenants (*i.e.*, the means of the Tenants' infringement). Specifically, Defendants have the ultimate form of control over their Tenants' means of infringement insofar as Defendants

have the ability to: (a) refrain from renewing the leases (and/or licenses) of Tenants at the Market who have been engaged in the sale of items bearing counterfeits of the Louis Vuitton Trademarks; (b) terminate the leases (and/or licenses) of Tenants at the Market who have been engaged in the sale of items bearing counterfeits of the Louis Vuitton Trademarks; (c) seek the voluntary departure of Tenants at the Market who have been engaged in the sale of items bearing counterfeits of the Louis Vuitton Trademarks; and/or (d) promptly initiate eviction proceedings against Tenants at the Market who have been engaged in the sale of items bearing counterfeits of the Louis Vuitton Trademarks.

25. In short, the Market is a controlled environment where Defendants have governed the use of the space and how Tenants must conduct themselves while at the Market. In fact, on March 31, 2017, this Court entered a Stipulation to Permanent Injunction directing the Market to control its own conduct and that of its Tenants by permanently restraining and enjoining the Market from infringing, or knowingly assisting any other person or entity from infringing Ray-Ban trademarks owned by Luxottica Group S.p.A. *Luxottica Group S.p.A. v. Westgate Discount Mall, Inc. et al.*, No. 16 Civ. 227 (N.D. Ga. March 31, 2017) (Dkt #30). In the Permanent Injunction, this Court further ordered the Market to “take all appropriate steps to prevent the sale of products bearing the Ray-Ban Marks and/or marks identical and/or confusingly similar thereto by third-party vendors who advertise, market,

offer for sale, and/or sell goods on premises owned, operated, and/or controlled by [the Market], including but not limited to expressly prohibiting its vendors from advertising, displaying, offering for sale, and/or selling said products.” *Id.* at 2.

26. Despite the foregoing, Defendants have failed to implement any rules or adopt or employ any practices or procedures that would reduce or eliminate the counterfeiting occurring at the Market. As a result, the Market, with Defendants’ full knowledge, has become a hotbed for illicit activity with Tenants engaging in the open, notorious and/or obvious sale of goods bearing counterfeit Louis Vuitton Trademarks.

27. While such counterfeiting activities were often open and/or obvious, on many occasions, Defendants were specifically notified of the counterfeiting taking place at the Market, including the counterfeiting of the Louis Vuitton Trademarks.

28. Indeed, on numerous occasions prior to the filing of this action, Louis Vuitton notified Defendants of specific Tenants at the Market who were engaged in the sale of products bearing counterfeit Louis Vuitton Trademarks.

29. Specifically, Louis Vuitton sent at least 31 notices to the Market concerning specific Tenants at the Market who had attempted to import products bearing counterfeit Louis Vuitton Trademarks to their booth location, but had such products seized by United States Customs and Border Protection and/or who had been observed while they were engaged in the sale, or offer for sale, of products

bearing counterfeit Louis Vuitton Trademarks by investigators acting on behalf of Louis Vuitton.

30. Further, investigators acting on behalf of Louis Vuitton have served by hand, and in plain view on the premises, at least 20 cease and desist letters to Tenants of the Market who were engaged in the sale, or offer for sale, of products bearing counterfeit Louis Vuitton Trademarks.

31. Additionally, in plain view, and on numerous occasions prior to the filing of this action, law enforcement agencies seized counterfeit items from Tenants at the Market, including goods bearing counterfeit Louis Vuitton Trademarks. In fact, and also in plain view, law enforcement has arrested several of the Market's counterfeiting Tenants, including those engaged in the sale of goods bearing counterfeit Louis Vuitton Trademarks.

32. Most recently, on August 18, 2021, Georgia State Police, Fulton County Police, and the U.S. Department of Homeland Security – Homeland Security Investigations executed a search warrant on the Market to search for counterfeit goods. During the execution of this search warrant, and upon information and belief, law enforcement searched nearly every booth at the Market (60 out of the 62 booths) and seized products bearing counterfeit and infringing trademarks in every single booth searched.

33. Upon information and belief, a total of **eighteen (18) tractor trailer loads of products** bearing counterfeit and infringing trademarks were seized during the operation. In all, more than 250,000 products were seized—including **over 72,000 items bearing counterfeit and infringing Louis Vuitton Trademarks**. The fair market value of the counterfeit Louis Vuitton products seized is in the tens of millions of U.S. dollars.

34. Upon information and belief, the August 18, 2021 seizure that took place at the Market is one of the largest seizures of goods bearing counterfeit Louis Vuitton Trademarks in U.S. history. The seizure received significant coverage from the press, and it was reported that Governor Brian Kemp briefly appeared at the Market on the day of the seizure as set forth in Exhibit B attached hereto.

35. Photographs from the seizure are shown below:







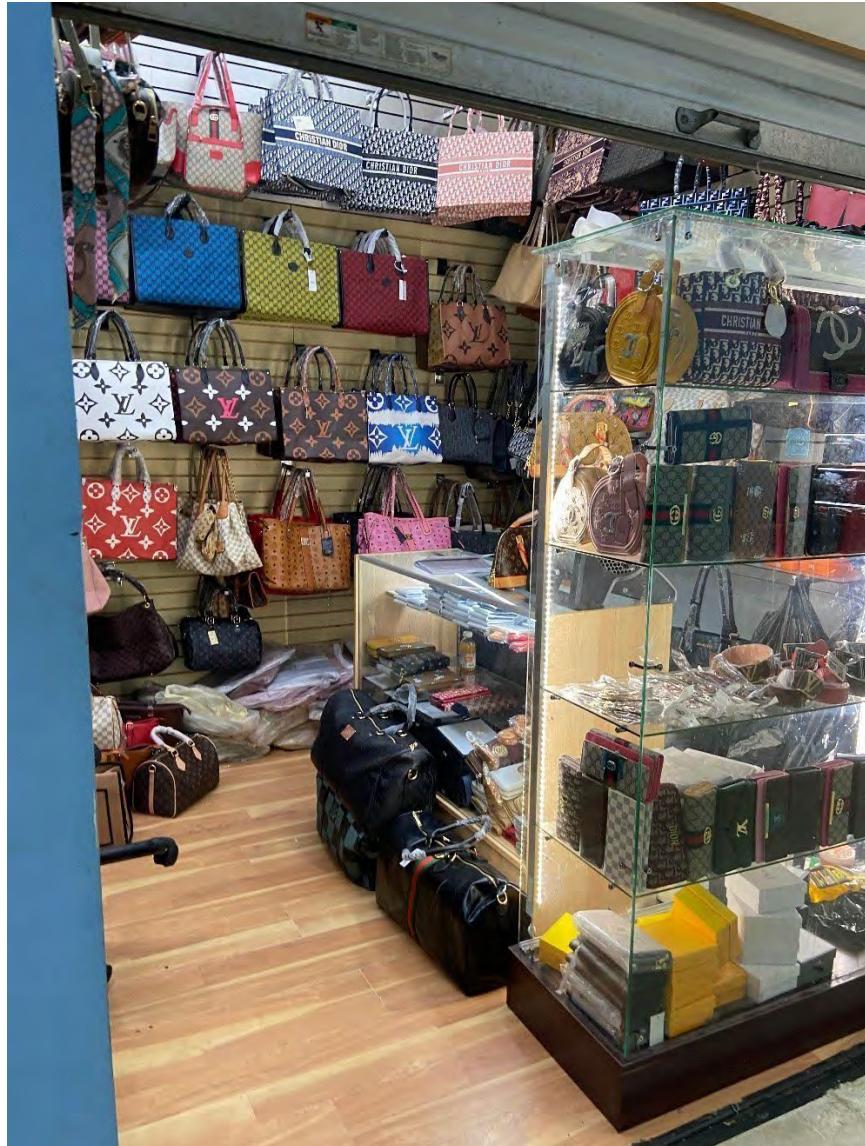


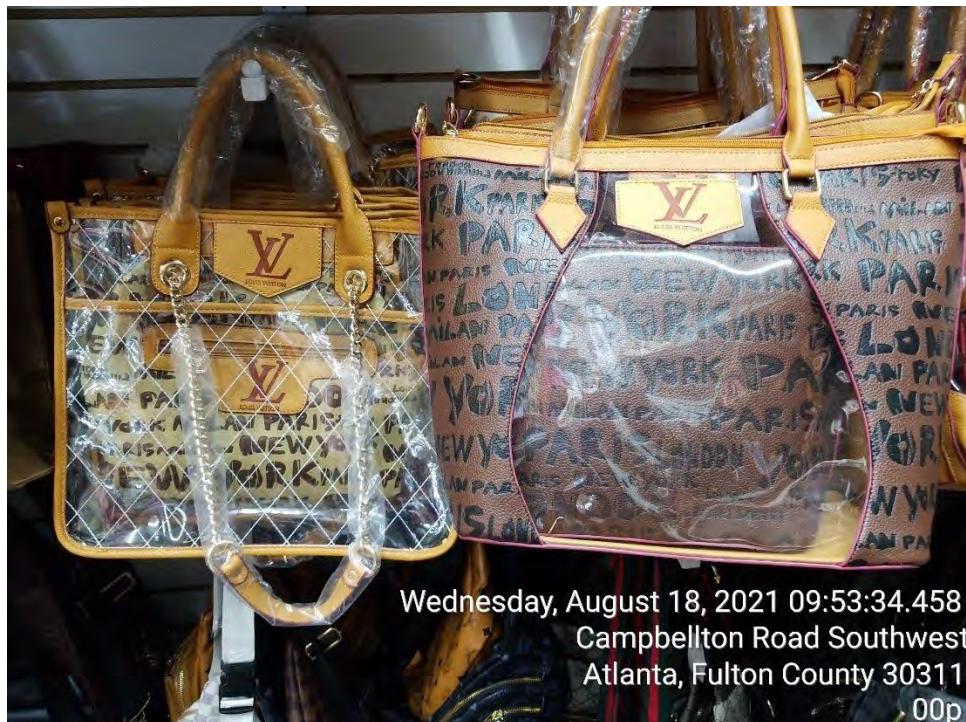
36. Representative photographs showing the open display of counterfeit Louis Vuitton Products throughout the Market are shown below:









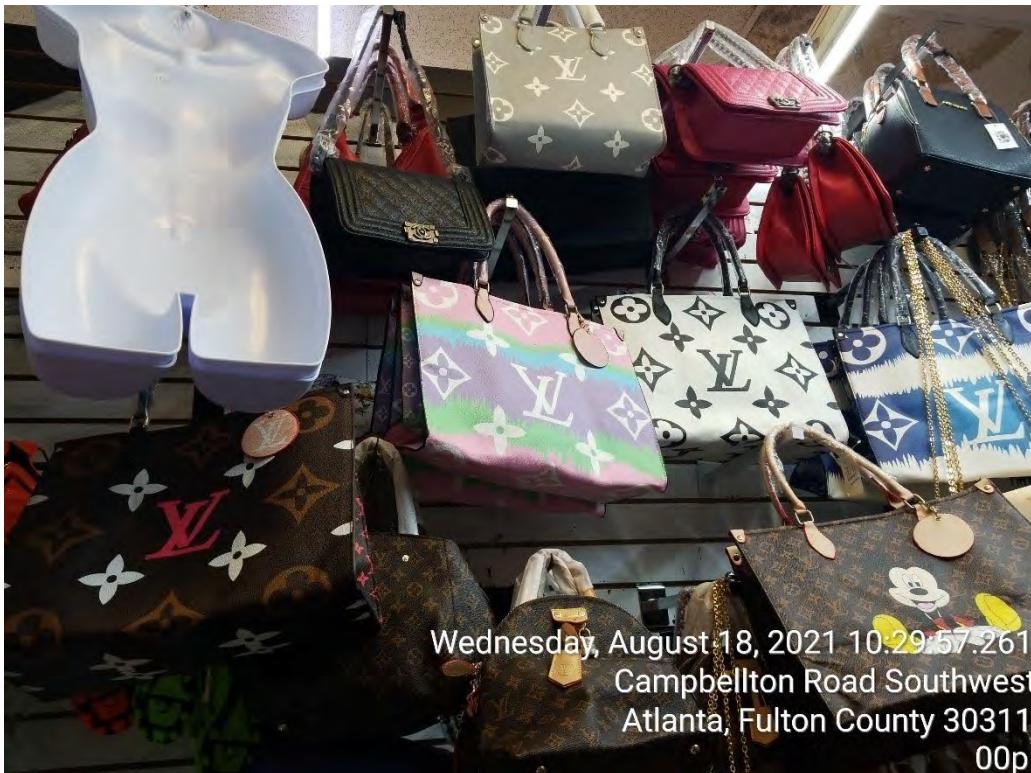




Wednesday, August 18, 2021 10:20:36.520  
Campbellton Road Southwest  
Atlanta, Fulton County 30311  
00p



Wednesday, August 18, 2021 10:24:23.691  
Campbellton Road Southwest  
Atlanta, Fulton County 30311  
00p



Wednesday, August 18, 2021 10:29:57.261  
Campbellton Road Southwest  
Atlanta, Fulton County 30311  
00p



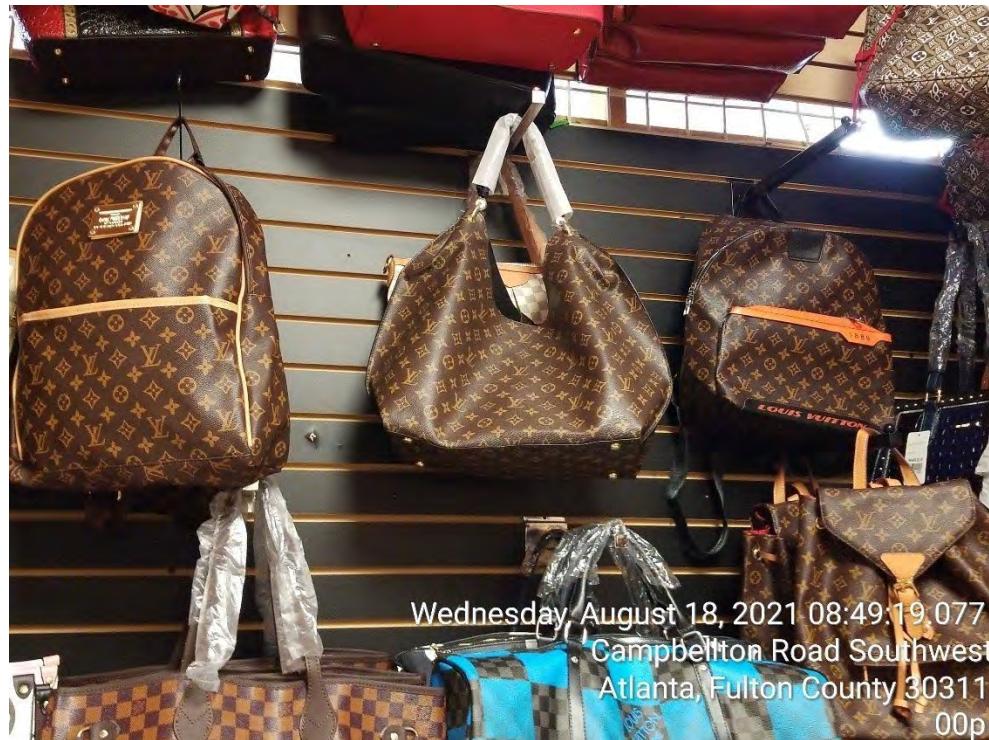
Wednesday, August 18, 2021 10:30:07.354  
Campbellton Road Southwest  
Atlanta, Fulton County 30311  
00p

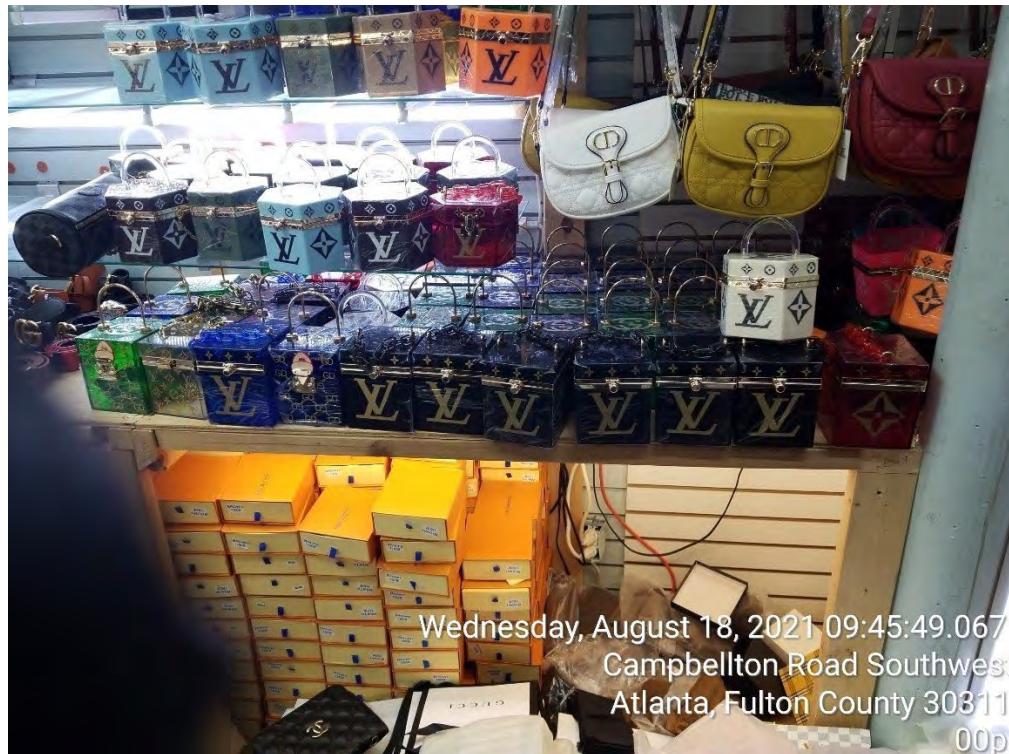


Wednesday, August 18, 2021 10:28:15.242  
Campbellton Road Southwest  
Atlanta, Fulton County 30311  
00p



Wednesday, August 18, 2021 08:48:50.854  
Campbellton Road Southwest  
Atlanta, Fulton County 30311  
00p





Wednesday, August 18, 2021 09:45:49.067  
Campbellton Road Southwest  
Atlanta, Fulton County 30311  
00p



Wednesday, August 18, 2021 09:47:37.096  
Campbellton Road Southwest  
Atlanta, Fulton County 30311  
00p



37. Based on the foregoing, Defendants were fully aware that Tenants at the Market were engaged in the sale, and offer for sale, of products bearing counterfeit Louis Vuitton Trademarks.

38. Defendants knew, or had reason to know, that a substantial number of items bearing counterfeits of the Louis Vuitton Trademarks have been sold or offered for sale at the Market.

39. Defendants, moreover, knew that Louis Vuitton has never authorized the sale of Louis Vuitton Products or the use of the Louis Vuitton Trademarks at the Market.

40. Nevertheless, Defendants allowed counterfeiting of Louis Vuitton Trademarks to occur at the Market on an unprecedented scale despite Louis

Vuitton's (and other intellectual property owners') pleas to Defendants to "clean up" the Market, and even though Defendants knew, know, had reason to know, or have reason to know, that trademark counterfeiting is against the law.

41. Despite numerous warnings that their Tenants sold or offered for sale goods bearing counterfeit Louis Vuitton Trademarks, Defendants failed to supervise their premises and comply with their legal obligations to curb counterfeiting at the Market because Defendants would make less money if they were to evict their counterfeiting Tenants. In fact, if Defendants kicked out all the Market's counterfeiters, Defendants would have few, if any, Tenants left, and Defendants' revenues and profits would plummet.

42. Moreover, Defendants have been aware of, materially contributed to, and obtained a financial benefit from the sale of merchandise bearing counterfeits of intellectual property at the Market (including the Louis Vuitton Trademarks). Defendants reap substantial financial benefits derived from the sale of counterfeit items at the Market, including, but not limited to, increased: customer traffic; numbers of Tenants; storefront/booth rental revenue; and value of their business. Defendants are financially motivated to "turn a blind eye" to counterfeiting at the Market, or to affirmatively assist in the counterfeiting and protect their counterfeiting Tenants.

43. By engaging in their unlawful conduct, Defendants have enjoyed the financial fruits of continuing to do business with their counterfeiting Tenants.

44. Under the circumstances, Defendants had an obligation to take all steps necessary to curb or end the counterfeiting of Louis Vuitton Trademarks at the Market by Tenants they knew or had reason to know were selling products bearing counterfeits of the Louis Vuitton Trademarks at the Market. Defendants, however, failed to do so.

45. Instead, Defendants owned, operated and managed a Georgia business centered on the sale of counterfeit merchandise, including merchandise bearing counterfeit Louis Vuitton Trademarks. Defendants recklessly disregarded Louis Vuitton's rights and/or willfully blinded themselves to permit the sale of counterfeit merchandise throughout the entire Market. This is an exceptional case under 15 U.S.C. § 1117(a), entitling Louis Vuitton to all of the remedies set forth in 15 U.S.C. §§ 1117(b) and (c).

46. The counterfeiting of the Louis Vuitton Trademarks at the Market is likely to cause, is causing, and will continue to cause a likelihood of confusion, deception and mistake on the part of consumers, the public, and the trade. Defendants' conduct has caused, and will continue to cause, irreparable harm to Louis Vuitton. Accordingly, Louis Vuitton has no adequate remedy at law, and

Defendants must be enjoined from any further conduct contributing in any way to the counterfeiting and infringement of the Louis Vuitton Trademarks.

47. Defendants have been unjustly enriched by allowing their Tenants to illegally use and misappropriate Louis Vuitton's intellectual property.

48. Louis Vuitton has suffered harm as a result of the brazen acts of Defendants in an amount thus far not determined. The injuries and damages sustained by Louis Vuitton have been directly and proximately caused by Defendants' wrongful conduct.

**FIRST CLAIM FOR RELIEF (All Defendants)**

**Contributory Trademark Liability**

49. Louis Vuitton hereby incorporates by reference and realleges each and every allegation of paragraphs 1 through 48 above.

50. The unauthorized use of the Louis Vuitton Trademarks at the Market by Defendants' Tenants infringes upon each of Louis Vuitton's federally registered marks (*i.e.*, the Louis Vuitton Trademarks) in violation of section 32(1) of the Trademark Act of 1946 as amended (the "Lanham Act"), 15 U.S.C. § 1114(1).

51. The unauthorized use of the Louis Vuitton Trademarks at the Market by Defendants' Tenants has caused and will continue to cause confusion, mistake, and deception.

52. Through their actions, inaction and conduct, Defendants have

materially contributed to the above-described counterfeiting and infringement of the Louis Vuitton Trademarks. Among other things, Defendants supplied the site, space, facilities, and a marketplace to Tenants that Defendants knew or had reason to know were selling, or offering for sale, products bearing counterfeit Louis Vuitton Trademarks. Hosts such as Defendants who permit Tenants to use their premises cannot remain willfully blind of their Tenants' directly infringing acts.

53. Defendants' conduct constitutes contributory infringement of the Louis Vuitton Trademarks.

54. By reason of the foregoing, Defendants are liable to Louis Vuitton for any and all of the remedies available to Louis Vuitton under 15 U.S.C. §§ 1116 and 1117 of the Lanham Act.

**SECOND CLAIM FOR RELIEF (Defendant Basirou Kebbay)**

**Vicarious Liability – All Counts**

55. Louis Vuitton hereby incorporates by reference and realleges each and every allegation of Paragraphs 1 through 54 above.

56. As a moving, active, and conscious force behind Defendants' unlawful conduct, Defendant Basirou Kebbay is jointly and severally liable with Defendants Westgate Discount Mall, Inc. and Aaron Kebe under all counts of the Complaint.

**THIRD CLAIM FOR RELIEF (Defendant Aaron Kebe)**

**Vicarious Liability – All Counts**

57. Louis Vuitton hereby incorporates by reference and realleges each and every allegation of Paragraphs 1 through 56 above.

58. As a moving, active, and conscious force behind Defendants' unlawful conduct, Defendant Aaron Kebe is jointly and severally liable with Defendants Westgate Discount Mall, Inc. and Basirou Kebbay under all counts of the Complaint.

**PRAYER FOR RELIEF**

**WHEREFORE**, Louis Vuitton demands Judgment against Defendants, and each of them, jointly and severally, as follows:

A. Finding that Defendants Westgate Discount Mall, Inc., Basirou Kebbay and Aaron Kebe have counterfeited or infringed the Louis Vuitton Trademarks in violation of Section 32(a) of the Lanham Act, 15 U.S.C. § 1114(a).

B. That pursuant to and in accordance with Federal Rule of Civil Procedure 65, 15 U.S.C. § 1116, preliminary and permanent injunctions be issued enjoining the Defendants and each of them, and their respective agents, servants, employees, officers, successors, licensees and assigns, and all persons acting in concert or participation with each or any of them, from, directly or indirectly:

1. counterfeiting or infringing any of the Louis Vuitton Trademarks;

2. causing, contributing to, enabling, facilitating, allowing, tolerating, or participating in the counterfeiting or infringement of any of the Louis Vuitton Trademarks;
3. allowing Tenants at the Market who have been or are currently engaged in the sale or offer for sale of merchandise bearing counterfeit Louis Vuitton Trademarks to continue doing business at the Market;
4. using any reproduction, counterfeit, copy or colorable imitation of the Louis Vuitton Trademarks in any publicity, advertisement, importation, promotion, display, distribution, sale, or offer for sale of goods or otherwise pertaining to the Market;
5. using the Louis Vuitton Trademarks in a manner calculated to falsely represent, or which has the effect of falsely representing, that products sold at the Market are sponsored by, authorized by, or in any way associated with Louis Vuitton; and
6. otherwise unfairly competing with Louis Vuitton.

C. That Louis Vuitton be awarded statutory damages from each of the Defendants in an amount of up to \$2,000,000 per counterfeit mark per each type of goods (as provided by 15 U.S.C. § 1117(c) of the Lanham Act as amended), or, at Louis Vuitton's election, that Defendants be required to account to Louis Vuitton

for all damages and/or profits resulting from the unlawful activities of Defendants and/or their Tenants, and that the award to Louis Vuitton be trebled as provided for under 15 U.S.C. §1117.

D. That Louis Vuitton be awarded a sum that is just under the facts and circumstances of this action in accordance with 15 U.S.C. § 1117.

E. That Louis Vuitton be awarded pre-judgment interest in accordance with 15 U.S.C. §1117.

F. That Louis Vuitton be awarded its costs and expenses of this action, including, but not limited to, Louis Vuitton's attorneys' fees, investigators' fees and other costs as provided for under 15 U.S.C. § 1117.

G. That Louis Vuitton be awarded all other and further relief as the Court may deem just and proper under the facts and circumstances of this case.

Dated: April 11, 2023

Respectfully submitted,

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*Attorneys for Plaintiff Louis Vuitton*  
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/s/ John H. Zacharia  
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john@zacharialaw.com

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Washington, D.C. 20036  
(202) 429-3000

/s/ Michael J. Allan  
Michael J. Allan, Esq.  
mallan@steptoe.com

**DEMAND FOR JURY TRIAL**

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff Louis Vuitton requests a trial by jury in this matter.

Dated: April 11, 2023

Respectfully submitted,

Strongwater & Associates  
*Attorneys for Plaintiff Louis Vuitton*  
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/s/ Michael J. Allan  
Michael J. Allan, Esq.  
mallan@steptoe.com

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1D**

Pursuant to Local Rule 7.1D of the United States District Court for the Northern District of Georgia, the undersigned hereby certify that the foregoing filing is a computer-generated document, prepared in Times New Roman, 14-point font, in accordance with Local Rule 5.1C of the United District Court for the Northern District of Georgia.

/s/ Jay L. Strongwater  
Jay L. Strongwater, Esq.  
Ga. Bar No. 688750

# Exhibit A

Int. Cl.: 18

Prior U.S. Cl.: 3

**United States Patent Office**

**Reg. No. 1,045,932**

**Registered Aug. 10, 1976**

**TRADEMARK**  
Principal Register

**LOUIS VUITTON**

Vuitton et Fils S.A.R.L. (French corporation)  
18, Rue du Congres  
92600 Asnieres, France

For: LUGGAGE AND LADIES' HANDBAGS,  
in CLASS 18 (U.S. CL. 3).  
First use at least as early as 1875; in commerce at least  
as early as 1925.

Ser. No. 60,441, filed Aug. 13, 1975.

B. A. CHAPMAN, Examiner

Int. Cls.: 14, 16, 18, 24 and 25

Prior U.S. Cls.: 1, 2, 3, 5, 22, 23, 27, 28, 29, 37, 38,

39, 41, 42 and 50

Reg. No. 1,990,760

**United States Patent and Trademark Office**

Registered Aug. 6, 1996

**TRADEMARK  
PRINCIPAL REGISTER**

**LOUIS VUITTON**

LOUIS VUITTON MALLETIER (FRANCE CORPORATION)  
54, AVENUE MONTAIGNE  
75008 PARIS, FRANCE

FOR: WATCHES AND STRAPS FOR WRIST WATCHES, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FIRST USE 0-0-1910; IN COMMERCE 0-0-1910.

FOR: PHOTOGRAPH ALBUMS; CATALOGUES FEATURING LUGGAGE AND TRAVEL ACCESSORIES, BAGS, SMALL LEATHER GOODS AND GARMENTS; ENGAGEMENT BOOKS, NOTEBOOKS, PICTURE BOOKS, ANTHOLOGIES AND PAMPHLETS REFERRING TO TRAVEL; CALENDARS; TELEPHONE INDEXES; HAT BOXES OF CARDBOARD; OFFICE REQUISITES IN THE NATURE OF WRITING PADS, LETTER TRAYS, WRITING CASES, PENCIL HOLDERS; FOUNTAIN PENS, BALLPOINT PENS, NIBS, INK WELLS, INK STANDS; PLAYING CARDS; COVERS FOR POCKET AND DESK DIARIES, AND CHECKBOOK HOLDERS, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 0-0-1923; IN COMMERCE 0-0-1923.

FOR: TRUNKS; TRAVELING TRUNKS; SUITCASES; TRAVELING BAGS; LUGGAGE; GARMET BAGS FOR TRAVEL; HAT BOXES FOR TRAVEL; SHOE BAGS FOR TRAVEL; UMBRELLAS; ANIMAL CARRIERS; BAGS FOR CLIMBERS; BAGS FOR CAMPERS; RUCKSACKS; HAVERSACKS; LEATHER OR TEX-

TILE SHOPPING BAGS; BEACH BAGS; HUNTERS' GAME BAGS; HANDBAGS; VANITY CASES SOLD EMPTY; ATTACHE CASES; SCHOOL BAGS; SCHOOL SATCHELS; TOTE BAGS, TRAVEL SATCHELS; CLUTCH BAGS; BRIEFCASES; WALLETS; POCKET WALLETS; CREDIT CARD CASES; BUSINESS CARD CASES; BILL AND CARD HOLDERS; CHECKBOOK HOLDERS; KEY CASES; CHANGE PURSES; BRIEFCASE-TYPE PORTFOLIOS; ENVELOPES OF LEATHER OR IMITATION LEATHER FOR PACKAGING, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 0-0-1854; IN COMMERCE 0-0-1898.

FOR: TRAVEL BLANKETS, IN CLASS 24 (U.S. CLS. 42 AND 50).

FIRST USE 0-0-1901; IN COMMERCE 0-0-1901.

FOR: SHIRTS; SWEATSHIRTS; POLO SHIRTS; T-SHIRTS; HEADWEAR; JACKETS; TIES; BELTS; SHAWLS; SASHES; SCARVES, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 0-0-1909; IN COMMERCE 0-0-1909.

OWNER OF U.S. REG. NOS. 1,045,932, 1,615,681 AND OTHERS.

THE NAME "LOUIS VUITTON" IS THE NAME OF THE DECEASED, FOUNDER OF THE APPLICANT'S BUSINESS.

SER. NO. 74-604,074, FILED 11-29-1994.

RANDY RICARDO, EXAMINING ATTORNEY

Int. Cl.: 14

Prior U.S. Cls.: 2, 27, 28 and 50

Reg. No. 2,904,197

United States Patent and Trademark Office

Registered Nov. 23, 2004

TRADEMARK  
PRINCIPAL REGISTER

LOUIS VUITTON

LOUIS VUITTON MALLETIER (FRANCE CORPORATION)  
2, RUE DU PONT-NEUF  
75001 PARIS, FRANCE

FOR: GOODS MADE OF PRECIOUS METALS, ALLOYS, OR COATED, NAMELY, ORNAMENTAL PINS, ASH TRAYS FOR SMOKERS, DECORATIVE BOXES AND JEWELRY BOXES, JEWELRY CASES AND WATCH CASES, POWDER COMPACTS SOLD EMPTY; JEWELRY, NAMELY, RINGS, EARRINGS, CUFF LINKS, BRACELETS, CHARMS, BROOCHES, NECKLACES, TIE PINS, AND MEDALLIONS; KEYRINGS MADE OF PRECIOUS METAL; BUCKLES MADE OF PRECIOUS METAL, NAMELY, BUCKLES FOR BELTS, BUCKLES FOR CLOTHING, BUCKLES FOR SCARVES, BUCKLES FOR HATS, BUCKLES FOR JEWELRY, BUCKLES FOR SHOES, BUCKLES FOR BAGS, BUCKLES FOR BOXES, BUCKLES FOR TRUNKS, BUCKLES FOR CASES, BUCKLES FOR PURSES, BUCKLES FOR WALLETS, BUCKLES FOR UMBRELLAS, BUCKLES FOR

CANES, BUCKLES FOR CLOCKS; HOROLOGICAL AND CHRONOMETRIC INSTRUMENTS, NAMELY, WATCHES, WRIST-WATCHES, CLOCKS, CHRONOGRAPHS, CHRONOMETERS AND ALARM CLOCKS; STRAPS FOR WRIST-WATCHES AND WATCH CASES, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

OWNER OF ERPN CMNTY TM OFC REG. NO. 001172857, DATED 6-9-2000, EXPIRES 5-11-2009.

OWNER OF U.S. REG. NOS. 1,045,932, 2,657,903 AND OTHERS.

THE NAME "LOUIS VUITTON" DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SER. NO. 76-485,867, FILED 1-28-2003.

RUSS HERMAN, EXAMINING ATTORNEY

**Int. Cls.: 9 and 24**

**Prior U.S. Cls.: 21, 23, 26, 36, 38, 42, and 50**

**Reg. No. 2,909,003**

**United States Patent and Trademark Office**

**Registered Dec. 7, 2004**

**TRADEMARK  
PRINCIPAL REGISTER**

**LOUIS VUITTON**

LOUIS VUITTON MALLETIER (FRANCE CORPORATION)  
2, RUE DU PONT-NEUF  
75001 PARIS, FRANCE

FOR: OPTICAL INSTRUMENTS AND APPARATUS, NAMELY, SPECTACLES, EYEGLASSES, SPECTACLE CASES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 10-0-1999; IN COMMERCE 10-0-1999.

FOR: TEXTILES AND TEXTILE GOODS, NAMELY, HOUSEHOLD LINEN INCLUDING BED AND

BATH LINEN, HANDKERCHIEFS OF TEXTILE, IN CLASS 24 (U.S. CLS. 42 AND 50).

FIRST USE 10-0-1999; IN COMMERCE 10-0-1999.

THE MARK DOES NOT IDENTIFY A LIVING INDIVIDUAL.

SN 76-347,342, FILED 12-12-2001.

RONALD AIKENS, EXAMINING ATTORNEY

United States of America  
United States Patent and Trademark Office

LOUIS VUITTON

**Reg. No. 4,530,921**

**Registered May 13, 2014**

**Int. Cls.: 9, 16, 25, and  
26**

**TRADEMARK**

**PRINCIPAL REGISTER**

LOUIS VUITTON MALLETIER (FRANCE SOCIÉTÉ ANONYME (SA))  
2, RUE DU PONT NEUF  
PARIS, FRANCE 75001

FOR: OPTICAL APPARATUS, NAMELY, BINOCULARS; BLANK USB STICKS; SPEC-TACLES; SUNGLASSES; SPECTACLE FRAMES; SPECTACLE GLASSES; SPECTACLE CASES; ACCESSORIES FOR TELEPHONES, MOBILE PHONES, SMART PHONES, TABLET DEVICES, PDAS, AND MP3 PLAYERS, NAMELY, COVERS, NECK STRAPS, NECK CORDS, AND BAGS AND CASES SPECIALLY ADAPTED FOR HOLDING OR CARRYING PORTABLE TELEPHONES AND TELEPHONE EQUIPMENT AND ACCESSORIES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 10-0-1999; IN COMMERCE 10-0-1999.

FOR: PAPER BAGS; BOXES OF CARDBOARD OR PAPER; CARDBOARD AND PAPER-BOARD ENVELOPES AND POUCHES FOR PACKAGING; PLASTIC MATERIALS FOR PACKAGING, NAMELY, BAGS; POSTERS; PAMPHLETS REFERRING TO TRAVEL; POSTCARDS; CATALOGS FEATURING LUGGAGE, TRAVEL ACCESSORIES, BAGS, SMALL LEATHER GOODS, AND CLOTHING; PAPER LABELS; TRADING CARDS; GREETING CARDS; BUSINESS CARDS; INVITATION CARDS; PRINTED PUBLICATIONS, NAMELY, BOOKS, NEWSPAPERS, LEAFLETS, AND MAGAZINES FEATURING LUGGAGE, TRAVEL ACCESSORIES, PURSES, SMALL LEATHER GOODS, AND CLOTHING; BOOK-BINDING MATERIALS; PRINTED PHOTOGRAPHS; PHOTOGRAPHALBUMS; STATIONERY, NAMELY, NOTE PADS, DESK PADS, WRITING PADS, DRAWING PADS, ENVELOPES, NOTE PAPER; CALENDARS; POCKET CALENDARS; NOTE BOOKS; TELEPHONE INDEXES; DIARY COVERS; DIARIES; OFFICE REQUISITES, NAMELY, LETTER TRAYS, PAPER KNIVES, INK STANDS, INK WELLS, PAPER WEIGHTS, PENCIL HOLDERS, PEN HOLDERS, PENCIL TUBS, BLOTTING PADS, PENCILS, FOUNTAIN PENS, RUBBER ERASERS, PEN CASES; PRINTING TYPES; PRINTING BLOCKS; TABLE LINENS OF PAPER, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 0-0-1923; IN COMMERCE 0-0-1923.

*Michelle K. Lee*

Deputy Director of the United States  
Patent and Trademark Office



FOR: CLOTHING, NAMELY, PULLOVERS, VESTS, SHIRTS, TEE-SHIRTS, TROUSERS, JACKETS, SUITS, COATS, RAIN COATS, WATERPROOF JACKETS, WATERPROOF PANTS, OVERCOATS, PARKAS, SKIRTS, DRESSES, PAJAMAS, DRESSING GOWNS, NIGHTGOWNS, ROBE, GLOVES, NECK TIES, BELTS FOR CLOTHING, LEATHER BELTS, SCARVES,

**Reg. No. 4,530,921** POCKET SQUARES, SASHES FOR WEAR, SHAWLS, STOCKINGS, SOCKS, TIGHTS, BRACES FOR CLOTHING, SUSPENDERS, STOLES, UNDERWEAR, LINGERIE, BATHING SUITS; HEADWEAR; SHOES; SLIPPERS; BOOTS; HALF-BOOTS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 0-0-1906; IN COMMERCE 0-0-1906.

FOR: BUTTONS; HOOKS AND EYES; SHOE BUCKLES; HAIR ACCESSORIES, NAMELY, HAIR PINS, BARRETTES, HAIR BOWS, HAIR CLIPS, HAIR BANDS, HAIR WRAPS; HAIR ORNAMENTS; BROOCHES FOR CLOTHING; CLOTHING FASTENERS, NAMELY, SCARF HOLDERS, IN CLASS 26 (U.S. CLS. 37, 39, 40, 42 AND 50).

FIRST USE 10-0-2004; IN COMMERCE 10-0-2004.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

PRIORITY CLAIMED UNDER SEC. 44(D) ON FRANCE APPLICATION NO. 11/3873579, FILED 11-14-2011, REG. NO. 11/3873579, DATED 11-14-2011, EXPIRES 11-14-2021.

OWNER OF U.S. REG. NOS. 1,045,932, 2,303,212, AND OTHERS.

THE NAME(S), PORTRAIT(S), AND/OR SIGNATURE(S) SHOWN IN THE MARK DOES NOT IDENTIFY A PARTICULAR LIVING INDIVIDUAL.

SN 85-981,550, FILED 5-11-2012.

KRISTINA MORRIS, EXAMINING ATTORNEY

# United States of America

## United States Patent and Trademark Office

# LOUIS VUITTON

**Reg. No. 6,855,032**

**Registered Sep. 27, 2022**

**Int. Cl.: 10**

**Trademark**

**Principal Register**

Louis Vuitton Malletier (FRANCE société par actions simplifiée (sas) )

2 rue du Pont Neuf

Paris, FRANCE 75001

CLASS 10: Sanitary face coverings in the nature of protective face shields for protection against viral infection; protective masks, namely, reusable sanitary masks for protection against viral infection; protective chin shields specially adapted for placement underneath sanitary masks for protection against viral infection; protective gloves, namely, sanitary gloves for protection against viral infection; face masks for medical use; surgical masks; protective face shields for medical use; protective chin shields for medical use; gloves for medical use

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT STYLE, SIZE OR COLOR

PRIORITY CLAIMED UNDER SEC. 44(D) ON EUROPEAN UNION APPLICATION NO. 018252818, FILED 06-11-2020, REG. NO. 018252818, DATED 09-25-2020, EXPIRES 06-11-2030

The name "LOUIS VUITTON" does not identify a living individual.

SER. NO. 90-303,975, FILED 11-06-2020



*Katherine Kelly Vidal*

Director of the United States  
Patent and Trademark Office



**Int. Cls.: 14, 16, 18 and 25**

**Prior U.S. Cls.: 1, 2, 3, 5, 22, 23, 27, 28, 29, 37,  
38, 39, 41 and 50**

**Reg. No. 2,346,373**

**Registered May 2, 2000**

**United States Patent and Trademark Office**

**TRADEMARK  
PRINCIPAL REGISTER**

**LOUIS VUITTON PARIS**

**LOUIS VUITTON MALLETIER (FRANCE CORPORATION)  
2, RUE DU PONT-NEUF  
75001 PARIS, FRANCE 75008**

**FOR: GOODS MADE OF PRECIOUS METAL, NAMELY, SHOE ORNAMENTS, HAT ORNAMENTS, ORNAMENTAL PINS, ASHTRAYS FOR SMOKERS, DECORATIVE BOXES, POWDER COMPACTS OF PRECIOUS METAL, JEWELRY CASES; JEWELRY, NAMELY, RINGS, BELT BUCKLES, EAR RINGS, CUFFLINKS, BRACELETS, CHARMS, BROOCHES, NECKLACES, TIE PINS, MEDALLIONS; HORLOGICAL AND CHRONOMETRIC INSTRUMENTS, STRAPS FOR WATCHES, WATCHES AND WRIST WATCHES, CASES FOR WATCHES, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).**

**FIRST USE 0-0-1988; IN COMMERCE 0-0-1988.**

**FOR: GOODS MADE OF PAPER OR OF CARDBOARD, NAMELY, BAGS OR PAPER FOR MERCHANDISE PACKAGING; BAGS OR BOXES MADE OF PAPER OR CARDBOARD; WATERCOLOR PICTURES; PICTURES, NAMELY, DRAWINGS; ARCHITECTURAL MODELS; PRINTED MATERIALS, NAMELY, POSTERS, PHOTO, STAMP, SCRAPBOOK AND WEDDING ALBUMS, ATLASES, PAMPHLETS IN THE FIELD OF LUGGAGE, BAGS, CLOTHING, FOOTWEAR, TRAVEL, AND SPORT EVENTS, GEOGRAPHICAL MAPS, POSTCARDS, CATALOGS IN THE FIELD OF LUGGAGE, BAGS, CLOTHING, FOOTWEAR, TRAVEL, AND SPORT EVENTS, PRINTED LABELS NOT OF TEXTILE, BOOKS, NAMELY,**

**APPOINTMENT BOOKS, TRAVEL BOOKS, EDUCATIONAL BOOKS IN THE FIELD OF LUGGAGE, BAGS, CLOTHING, FOOTWEAR, TRAVEL, AND SPORT EVENTS, NEWSPAPERS FOR GENERAL CIRCULATION, PERIODICALS IN THE FIELD OF LUGGAGE, BAGS, CLOTHING, FOOTWEAR, TRAVEL AND SPORT EVENTS, MAGAZINES IN THE FIELD OF LUGGAGE, BAGS, CLOTHING, FOOTWEAR, TRAVEL, AND SPORT EVENTS, GENERAL FEATURE MAGAZINES; BOOKBINDING MATERIAL, NAMELY, BOOKBINDING TAPE, BOOKBINDING WIRE AND CLOTH FOR BOOKBINDING; MOUNTED AND UNMOUNTED PHOTOGRAPHS; STATIONERY, NAMELY, WRITING PADS, DRAWING PADS, BLOTTERS, WRITING BOOKS, CALENDARS, NOTE BOOKS, ENVELOPES, WRITING PAPER, INDEXES; ADHESIVES FOR STATIONERY OR HOUSEHOLD PURPOSES; ARTISTS' MATERIAL, NAMELY, PAINT BRUSHES; ELECTRIC OR NON-ELECTRIC TYPEWRITERS; OFFICE REQUISITES, NAMELY, SLATE BOARDS FOR WRITING, INKING PADS, LETTER TRAYS, LETTER OPENERS, PENCILS, DESK STANDS AND HOLDERS FOR INK, PEN AND PENCILS, PAPERWEIGHTS, PENS AND PARTS THEREFOR, NAMELY, BALLS FOR BALLPOINT PENS AND NIBS FOR FOUNTAIN PENS; PRINTED INSTRUCTIONAL, EDUCATIONAL AND TEACHING MATERIAL IN THE FIELD OF LUGGAGE, BAGS, CLOTHING, FOOTWEAR, TRAVEL, AND SPORT EVENTS; PLASTIC BUBBLE PACKS FOR WRAPPING OR PACKAGING; PLASTIC FILM FOR INDUSTRIAL OR COM-**

MERCIAL WRAPPING; PLAYING CARDS; PRINTERS' TYPE AND PRINTING BLOCKS, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 0-0-1983; IN COMMERCE 0-0-1983.

FOR: GOODS MADE OF LEATHER OR OF IMITATIONS OF LEATHER NOT INCLUDED IN OTHER CLASSES, NAMELY, BOXES OF LEATHER OR LEATHERBOARD USED FOR TRAVEL PURPOSES, HAT BOXES FOR TRAVEL, ENVELOPES OF LEATHER FOR MERCHANDISE PACKAGING; TRUNKS, VALISES, TRAVELLING BAGS, TRAVELING SETS FOR CONTAINING COSMETICS, GARMET BAGS FOR TRAVEL, VANITY CASES SOLD EMPTY, RUCKSACKS, HANDBAGS, BEACH BAGS, SHOPPING BAGS, SHOULDER BAGS, ATTACHE CASES, BRIEFCASES, POUCHES; FINE LEATHER GOODS, NAMELY, POCKET WALLETS, PURSES, KEY CASES, CARD HOLDERS, CHECKBOOK HOLDERS; UMBRELLAS, PARASOLS, CANES, WALKING STICK SEATS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 0-0-1983; IN COMMERCE 0-0-1983.

FOR: CLOTHING AND UNDERWEAR, NAMELY, SWEATERS, SHIRTS, DRESS SHIELDS, CORSETS, SUITS, WAISTCOATS, SKIRTS, COATS, PULLOVERS, TROUSERS, DRESSES, CLOTHING JACKETS, SHAWLS, STOLES, SASHES FOR WEAR, SCARVES, NECKTIES, TIES, POCKET SQUARES, SUSPENDERS, CLOTHING GLOVES, CLOTHING BELTS, STOCKINGS, TIGHTS, SOCKS, BATHING SUITS, BATH ROBES, FOOTWEAR; HEAD WEAR AND WATERPROOF CLOTHING, NAMELY, RAINCOATS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 0-0-1987; IN COMMERCE 0-0-1987.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "PARIS", APART FROM THE MARK AS SHOWN.

SER. NO. 75-398,649, FILED 12-2-1997.

JENNIFER CHICOSKI, EXAMINING ATTORNEY

**Int. Cls.: 16 and 18**

**Prior U.S. Cls.: 2, 3, 22, 37, 38 and 41**

**United States Patent and Trademark Office**

**Reg. No. 1,615,681**  
Registered Oct. 2, 1990

**TRADEMARK  
PRINCIPAL REGISTER**



LOUIS VUITTON (FRANCE CORPORATION)  
30 RUE LA BOETIE  
PARIS, FRANCE

FOR: PAPER AND CARDBOARD GOODS, NAMELY POSTERS, PRODUCT CATALOGS AND BROCHURES, PRODUCT PICTURE ALBUMS, PRODUCT MAGAZINES AND NOTEBOOKS, CALENDARS, INDEXES, NOTEBOOKS, ENVELOPES, LABELS, WRITING PAPER, BOXES OF CARDBOARD OR PAPER, PACKING PAPER, BAGS OF PAPER OR PLASTIC FOR PACKAGING, PHOTOGRAPHS, PENCILS, PENCIL HOLDERS, FOUNTAIN PENS, BALLPOINT PENS, INKSTANDS, NIBS OF GOLD AND PLAYING CARDS, IN CLASS 16 (U.S. CLS. 2, 22, 37 AND 38).

FIRST USE 1-1-1981; IN COMMERCE 1-1-1981.

FOR: TRAVELING BAGS, TRUNKS, VALISES, SATCHELS, HAT BOXES AND SHOE BOXES FOR TRAVEL, POUCHES AND SHOULDER BAGS USED FOR LUGGAGE, TRAVEL KITS AND VANITY CASES SOLD EMPTY

AND USED FOR LUGGAGE, RUCKSACKS, SHOPPING BAGS AND BEACH BAGS IN THE NATURE OF LUGGAGE, HAND BAGS, POCKETBOOKS, BRIEFCASES, BRIEFCASE-TYPE PORTFOLIOS, WALLETS, BILLFOLDS, PASSPORT CASES, KEY CASES, CREDIT CARD CASES, BUSINESS CARD CASES, CHANGE PURSES, UMBRELLAS AND WALKING-STICK SEATS, IN CLASS 18 (U.S. CLS. 3 AND 41).

FIRST USE 1-1-1981; IN COMMERCE 1-1-1981.

OWNER OF FRANCE REG. NO. 1531858, DATED 5-19-1989, EXPIRES 5-19-1999.

OWNER OF U.S. REG. NOS. 286,345, 1,522,311 AND OTHERS.

THE ENGLISH TRANSLATION OF THE WORD "MALLETIER A PARIS" IN THE MARK IS "TRUNK MANUFACTURER TO PARIS".

SER. NO. 74-000,195, FILED 11-16-1989.

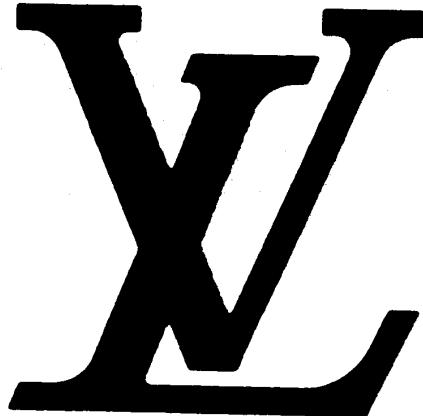
JODY HALLER DRAKE, EXAMINING ATTORNEY

Int. Cl.: 18

Prior U.S. Cl.: 3

**United States Patent and Trademark Office** **Reg. No. 1,519,828**  
**Registered Jan. 10, 1989**

**TRADEMARK  
PRINCIPAL REGISTER**



LOUIS VUITTON (FRANCE CORPORATION)  
30 RUE LA BOETIE  
PARIS, FRANCE

FOR: TRUNKS, VALISES, TRAVELING  
BAGS, SATCHELS, HAT BOXES AND SHOE  
BOXES USED FOR LUGGAGE, HAND BAGS,  
POCKETBOOKS, IN CLASS 18 (U.S. CL. 3).

FIRST USE 0-0-1897; IN COMMERCE  
0-0-1925.  
OWNER OF U.S. REG. NOS. 286,345 AND  
297,594.

SER. NO. 726,741, FILED 5-6-1988.

CHRIS A. F. PEDERSEN, EXAMINING ATTOR-  
NEY

Int. Cls.: 16 and 25

Prior U.S. Cls.: 5, 11, 29, 37, 38 and 39

**United States Patent and Trademark Office**

**Reg. No. 1,794,905**

Registered Sep. 28, 1993

**TRADEMARK  
PRINCIPAL REGISTER**



LOUIS VUITTON MALLETIER (FRANCE CORPORATION)  
54, AVENUE MONTAIGNE  
75008 PARIS, FRANCE, ASSIGNEE OF LOUIS  
VUITTON (FRANCE CORPORATION) 75008  
PARIS, FRANCE

FOR: TRAVEL GOODS CATALOGS, STATIONERY, PADS OF STATIONERY, CALENDARS, INDEXES FOR ARTICLES MADE FOR TRAVELLERS, NOTEBOOKS, ENVELOPES; PRINTED LABELS FOR LUGGAGE AND OTHER TRAVEL GOODS AND LEATHER HOLDERS THEREFOR, SOLD AS A UNIT; WRITING PAPER, PAPER OR PLASTIC BAGS FOR PACKAGING, HAT BOXES, PAPER OR CARDBOARD BOXES, PHOTOGRAPHS, ADHESIVES FOR STATIONERY, OFFICE REQUIREMENTS IN THE NATURE OF WRITING PADS, LETTER TRAYS, PAPER CUTTERS, LETTER

OPENERS, WRITING TABLETS, PENCILS, PENCIL HOLDERS, FOUNTAIN PENS, BALL-POINT PENS, PEN CASES, PENCIL CASES, LEAD HOLDERS, BALLPOINTS FOR PENS, NIBS, NIBS OF GOLD, INKWELLS, INK-STANDS, PLAYING CARDS, IN CLASS 16 (U.S. CLS. 5, 11, 29, 37 AND 38).

FOR: CLOTHING FOR MEN AND WOMEN; NAMELY BELTS, SHAWLS, SASHES, SCARVES; FOOTWEAR HEADGEAR, IN CLASS 25 (U.S. CL. 39).

OWNER OF FRANCE REG. NO. 1540178, DATED 7-7-1989, EXPIRES 7-7-1999.

OWNER OF U.S. REG. NOS. 286,345, 1,522,311 AND OTHERS.

SER. NO. 74-147,107, FILED 3-12-1991.

PATRICK, LEVY, EXAMINING ATTORNEY

Int. Cls.: 14 and 24

Prior U.S. Cls.: 2, 27, 28, 42 and 50

**United States Patent and Trademark Office** Reg. No. 1,938,808  
Registered Nov. 28, 1995

**TRADEMARK  
PRINCIPAL REGISTER**



MALLETIER, LOUIS VUITTON (FRANCE  
CORPORATION)  
54, AVENUE MONTAIGNE  
75008 PARIS, FRANCE

FOR: JEWELRY, WATCHES AND STRAPS  
FOR WRIST WATCHES, IN CLASS 14 (U.S. CLS.  
2, 27, 28 AND 50).  
FIRST USE 0-0-1910; IN COMMERCE  
0-0-1910.

FOR: TRAVEL BLANKETS MADE OF TEX-  
TILE, IN CLASS 24 (U.S. CLS. 42 AND 50).  
FIRST USE 0-0-1901; IN COMMERCE  
0-0-1901.  
OWNER OF U.S. REG. NOS. 286,345, 1,794,905  
AND OTHERS.

SER. NO. 74-618,480, FILED 1-6-1995.

CARYN HINES, EXAMINING ATTORNEY

**Int. Cl.: 25**

**Prior U.S. Cls.: 22 and 39**

**United States Patent and Trademark Office**

**Reg. No. 2,361,695**

**Registered June 27, 2000**

**TRADEMARK  
PRINCIPAL REGISTER**



LOUIS VUITTON MALLETIER (FRANCE CORPORATION)  
2 RUE DU PONT-NEUF  
75001 PARIS, FRANCE

FOR: CLOTHING AND UNDERWEAR, NAMELY,  
SWEATERS, SHIRTS, SWEATSHIRTS, POLO SHIRTS,  
T-SHIRTS, CORSETS, SUITS, WAISTCOATS, RAIN-  
COATS, SKIRTS, COATS, PULLOVERS, TROUSERS,  
DRESSES, JACKETS, SHAWLS, STOLES, SASHES  
FOR WEAR, SCARVES, NECKTIES, POCKET  
SQUARES, SUSPENDERS, POCKET HANDKERCHIEF

SQUARES FOR WEAR, BRACES, GLOVES, TIES,  
BELTS, STOCKINGS, TIGHTS, SOCKS, BATH  
ROBES, BATHING SUITS, SHOES, BOOTS AND  
SANDALS, TIPS FOR FOOTWEAR; HATS AND  
CAPS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 0-0-1896; IN COMMERCE 0-0-1981.  
OWNER OF U.S. REG. NOS. 1,519,828, 1,794,905,  
AND 1,938,808.

SER. NO. 75-620,753, FILED 1-13-1999.

INGRID C. EULIN, EXAMINING ATTORNEY

Int. Cls.: 9 and 24

Prior U.S. Cls.: 21, 23, 26, 36, 38, 42, and 50

Reg. No. 2,909,002

United States Patent and Trademark Office

Registered Dec. 7, 2004

TRADEMARK  
PRINCIPAL REGISTER



LOUIS VUITTON MALLETIER (FRANCE CORPORATION)  
2, RUE DU PONT-NEUF  
75001 PARIS, FRANCE

FOR: OPTICAL INSTRUMENTS AND APPARATUS, NAMELY, SPECTACLES, EYEGLASSES, SPECTACLE CASES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 10-0-1999; IN COMMERCE 10-0-1999.

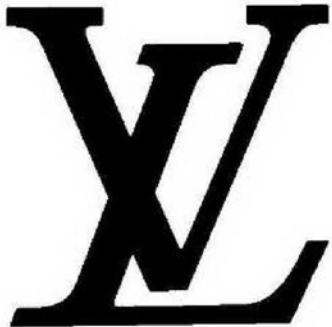
FOR: TEXTILES AND TEXTILE GOODS, NAMELY, HOUSEHOLD LINEN, NAMELY, BATH LINEN, IN CLASS 24 (U.S. CLS. 42 AND 50).

FIRST USE 10-0-1999; IN COMMERCE 10-0-1999.

SN 76-347,341, FILED 12-12-2001.

CATHERINE FAINT, EXAMINING ATTORNEY

United States of America  
United States Patent and Trademark Office



**Reg. No. 4,614,736**

LOUIS VUITTON MALLETIER (FRANCE SOCIÉTÉ ANONYME (SA))  
2, RUE DU PONT NEUF  
PARIS, FRANCE 75001

**Registered Sep. 30, 2014**

**Int. Cls.: 9, 16, and 26**

**TRADEMARK**

**PRINCIPAL REGISTER**

FOR: OPTICAL APPARATUS, NAMELY, BINOCULARS; BLANK USB STICKS; SPEC-TACLES; SUNGLASSES; SPECTACLE FRAMES; SPECTACLE GLASSES; SPECTACLE CASES; ACCESSORIES FOR TELEPHONES, MOBILE PHONES, SMART PHONES, TABLET DEVICES, PDAS, AND MP3 PLAYERS, NAMELY, COVERS, NECK STRAPS, NECK CORDS, AND BAGS AND CASES SPECIALLY ADAPTED FOR HOLDING OR CARRYING PORTABLE TELEPHONES AND TELEPHONE EQUIPMENT AND ACCESSORIES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 10-0-1999; IN COMMERCE 10-0-1999.

FOR: PAPER BAGS, BOXES OF CARDBOARD OR PAPER, CARDBOARD AND PAPER-BOARD ENVELOPES AND POUCHES FOR PACKAGING; PLASTIC MATERIALS FOR PACKAGING, NAMELY, BAGS; POSTERS; PAMPHLETS REFERRING TO TRAVEL; POSTCARDS; CATALOGS FEATURING LUGGAGE, TRAVEL ACCESSORIES, BAGS, SMALL LEATHER GOODS, AND CLOTHING; PAPER LABELS; TRADING CARDS; GREETING CARDS; BUSINESS CARDS; INVITATION CARDS; PRINTED PUBLICATIONS, NAMELY, BOOKS, NEWSPAPERS, LEAFLETS, AND MAGAZINES FEATURING LUGGAGE, TRAVEL ACCESSORIES, PURSES, SMALL LEATHER GOODS, AND CLOTHING; BOOK-BINDING MATERIALS; PRINTED PHOTOGRAPHS; PHOTOGRAPHALBUMS; STATIONERY, NAMELY, NOTE PADS, DESK PADS, WRITING PADS, DRAWING PADS, ENVELOPES, NOTE PAPER; CALENDARS; POCKET CALENDARS; NOTE BOOKS; TELEPHONE INDEXES; DIARY COVERS; DIARIES; OFFICE REQUISITES, NAMELY, LETTER TRAYS, PAPER KNIVES, INK STANDS, INKWELLS, PAPER WEIGHTS, PENCIL HOLDERS, PEN HOLDERS, PENCIL TUBS, BLOTTING PADS, PENCILS, FOUNTAIN PENS, RUBBER ERASERS, PEN CASES; PRINTING TYPES; PRINTING BLOCKS; TABLE LINENS OF PAPER, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FIRST USE 0-0-1923; IN COMMERCE 0-0-1923.

*Michelle K. Lee*

Deputy Director of the United States  
Patent and Trademark Office



FOR: BUTTONS; HOOKS AND EYES; SHOE BUCKLES; HAIR ACCESSORIES, NAMELY, HAIR PINS, BARRETTES, HAIR BOWS, HAIR CLIPS, HAIR BANDS, HAIR WRAPS; HAIR ORNAMENTS; BROOCHES FOR CLOTHING; CLOTHING FASTENERS, NAMELY, SCARF HOLDERS, IN CLASS 26 (U.S. CLS. 37, 39, 40, 42 AND 50).

**Reg. No. 4,614,736** FIRST USE 0-0-2004; IN COMMERCE 10-0-2004.

PRIORITY CLAIMED UNDER SEC. 44(D) ON FRANCE APPLICATION NO. 11/3873608,  
FILED 11-14-2011, REG. NO. 11/3873608, DATED 11-14-2011, EXPIRES 11-14-2021.

OWNER OF U.S. REG. NOS. 286,345, 1,519,828, AND OTHERS.

THE MARK CONSISTS OF THE STYLIZED LETTERS "L" AND "V".

SN 85-981,551, FILED 5-14-2012.

KRISTINA MORRIS, EXAMINING ATTORNEY

# United States of America

## United States Patent and Trademark Office



**Reg. No. 6,874,886**

**Registered Oct. 18, 2022**

**Int. Cl.: 10**

**Trademark**

**Principal Register**

Louis Vuitton Malletier (FRANCE société par actions simplifiée (sas) )  
2 rue du Pont Neuf  
Paris, FRANCE 75001

CLASS 10: face shields for protection against viral infection; fashion face masks being sanitary masks for protection against viral infection; face coverings incorporating protective chin shields being sanitary masks for protection against viral infection; protective gloves for medical use; Face masks for medical use; Surgical masks; protective face shields for medical use; protective chin shields for medical use; gloves for medical use

OWNER OF EUROPEAN UNION , REG. NO. 018324635, DATED 02-27-2021,  
EXPIRES 10-21-2030

PRIORITY CLAIMED UNDER SEC. 44(D) ON FRANCE APPLICATION NO. 018253273, FILED 06-15-2020

The mark consists of "LV" in stylized font.

SER. NO. 90-303,987, FILED 11-06-2020



*Katherine Kelly Vidal*

Director of the United States  
Patent and Trademark Office



# United States of America

## United States Patent and Trademark Office



**Reg. No. 5,477,535**

**Registered May 29, 2018**

**Int. Cl.: 9, 14, 18, 25, 41**

**Service Mark**

**Trademark**

**Principal Register**

LOUIS VUITTON MALLETIER (FRANCE Société Anonyme )  
2 Rue Du Pont-neuf  
F-75001 Paris  
FRANCE

CLASS 9: Scientific, nautical, surveying, photographic, cinematographic, optical, weighing, measuring, signaling, checking and supervision, life-saving and teaching apparatus and instruments, namely, life vests; apparatus for recording, transmission, reproduction of sound or images, magnetic recording media, namely, blank magnetic data carriers, blank sound recording disks; bags and cases for video cameras or photographic apparatus; blank recordable CD-Rs, blank recordable DVDs and other digital recording media, namely, blank digital storage media; calculating machines, data processing equipment, computers and computer equipment, namely, computer peripherals, computer keyboards, printers for use for computers, mouse pads; computer software for downloading, publishing, showing, displaying, labeling, blogging, and sharing electronic media or information via the Internet or other communications networks in the fields of travel, luggage, luxury goods, fashion, clothing, sports, sailing, and the arts; blank USB sticks, electronic agendas, game software, recorded computer programs, for downloading, displaying, and sharing electronic media or information via the Internet or other communications networks in the fields of travel, luggage, luxury goods, fashion, clothing, sports, sailing, and the arts; electronic publications, namely, catalogs, books, brochures, pamphlets, and booklets in the fields of travel, luggage, luxury goods, fashion, clothing, sports, sailing, and the arts downloadable online or from the Internet; spectacles, sunglasses; spectacle frames; spectacle lenses, contact lenses; cases for spectacles or for contact lenses; signaling buoys, marker buoys in the nature of positioning buoys; telephones, mobile telephones, smartphones, tablets computers, personal electronic assistants (PDAs) and MP3 players; accessories for telephones, mobile telephones, smartphones, tablet computers, PDAs, and MP3 players, namely, hands-free kits for telephones, batteries, covers and cases, protective covers in the nature of facings; battery chargers, straps and lanyards for use with telephones, mobile telephones, smartphones, tablet computers, PDAs, and MP3 players, earphones; bags and cases specially adapts for holding or carrying mobile telephones and telephone equipment



*Andrei Lanov*

Director of the United States  
Patent and Trademark Office

CLASS 14: Jewelry; fashion jewelry, especially precious or semi-precious stones, pearls, rings, earrings, cuff links, bracelets, charms, brooches, necklaces, pendants, key rings of precious metal, tie pins, medallions, jewelry rolls for travel; jewelry boxes; trophies of precious metal; timepieces, watches, wristwatches, watch straps, alarm clocks, stop watches, clock and watch making pendulums and cases or presentation cases for timepieces

CLASS 18: Boxes of leather or imitation leather; travel bags, travel sets, namely, leather travel bags, trunks and suitcases, garment travel bags for footwear; unfitted vanity cases; backpacks, handbags; sports bags; evening bags, namely, clutch bags, attaché cases and briefcases of leather; wallets, purses, card wallets, key cases of leather; parasols, umbrellas

CLASS 25: Clothing, namely, pullovers, vests, shirts, tee-shirts, trousers, jackets, suits, coats, raincoats, overcoats, parkas, skirts, dresses; pajamas, house coats, night shirts, dressing gowns; clothing accessories, namely, hats, caps, bonnets, gloves, neckties, belts, leather belts, scarves, pocket squares, shawls, stockings, socks, tights, suspenders, stoles; underwear, lingerie; bathing suits; footwear, slippers, boots and half-boots

CLASS 41: Educational, training, and entertainment services, namely, editing and publishing of catalogs, newspapers, books, magazines and texts other than for advertising in the field of travel, luggage, luxury goods, fashion, clothing, sports, and the arts; sporting activities, namely, arranging and organization of sporting competitions and of sailing contests; sporting and cultural activities, namely, sailing races; organization of sporting competitions and of sailing contests; radio entertainment, television show and film production; publishing of electronic publications, namely, on-line providing of electronic, non-downloadable publications; cultural activities, namely, organization of events for cultural purposes; organization of competitions for education or entertainment purposes, namely, sports competitions; arranging and conducting of educational conferences and congresses; educational services, namely, arranging and conducting of colloquiums and seminars in the field of travel, luggage, luxury goods, fashion clothing, sports, sailing, and the arts; educational services, namely, conducting educational conferences, congresses, seminars in the field of travel, luggage, luxury goods, fashion clothing, sports, sailing, and the arts; organization of exhibitions for cultural or educational purposes; arranging and conducting of concerts, specifically excluding concerts offered by or in nightclubs; museum services, namely, providing museum facilities presentations and exhibitions; production of fashion shows; entertainment information, information on education, information on education in the field of training; organization of fashion shows for entertainment purposes; photographic reporting; entertainment services in the nature of production and distribution of multimedia entertainment contents, namely, programs and events provided through audio and video for broadcasting on a telecommunications network including computer networks; photography, photographic reporting; publication of books, publication of texts other than advertising texts, electronic publication of books and magazines online, writing of texts other than advertising and publicity texts, publication of books and reviews

The mark consists of the overlapping stylized letters "LV" inside a circular border.

PRIORITY DATE OF 10-16-2014 IS CLAIMED

OWNER OF INTERNATIONAL REGISTRATION 1249344 DATED 11-26-2014,  
EXPIRES 11-26-2024

SER. NO. 79-166,089, FILED 11-26-2014

Int. Cl.: 18

Prior U.S. Cl.: 3

United States Patent and Trademark Office  
10 Year Renewal

Reg. No. 286,345  
Registered Aug. 25, 1931  
Renewal Term Begins Aug. 25, 1991

TRADEMARK  
PRINCIPAL REGISTER



LOUIS VUITTON (FRANCE CORPORATION)  
54, AVENUE MONTAIGNE  
75008, PARIS, FRANCE, BY CHANGE OF  
NAME AND MESNE ASSIGNMENT  
FROM VUITTON & VUITTON, SOCIETE  
A RESPONSABILITE LIMITEE  
(FRANCE CORPORATION) PARIS,  
FRANCE

OWNER OF FRANCE REG. NO. 219490,  
DATED 10-29-1908.  
FOR: TRUNKS, VALISES, TRAVEL-  
ING BAGS, [SATCHELS], HAT BOXES  
AND SHOE BOXES USED FOR LUG-  
GAGE, HAND BAGS, AND POCKET-  
BOOKS, IN CLASS 3 (INT. CL. 18).  
FIRST USE 0-0-1897; IN COMMERCE  
0-0-1897.

SER. NO. 71-313,984, FILED 4-29-1931.

*In testimony whereof I have hereunto set my hand  
and caused the seal of The Patent and Trademark  
Office to be affixed on Sep. 24, 1991.*

COMMISSIONER OF PATENTS AND TRADEMARKS

Registered Aug. 25, 1931

Trade-Mark 286,345

UNITED STATES PATENT OFFICE

VUITTON & VUITTON, SOCIETE A RESPONSABILITE LIMITEE, OF PARIS, FRANCE

ACT OF FEBRUARY 20, 1905

Application filed April 29, 1931. Serial No. 313,984.



STATEMENT

*To all whom it may concern:*

Be it known that Vuitton & Vuitton, Societe a Responsabilite Limitee, a corporation duly organized under the laws of the Republic of France, located in the city of Paris, France, and doing business at 70 Avenue des Champs-Elysees, in said city, has adopted for its use the trade-mark shown in the accompanying drawing.

The trade-mark has been continuously used in its business since 1897.

The particular description of goods to which the trade-mark is appropriated is TRUNKS, VALISES, TRAVELING BAGS, SATCHELS, HAT BOXES AND SHOE BOXES USED FOR LUGGAGE, HAND BAGS, AND POCKETBOOKS, comprised in Class 3, Baggage, animal equipments, portfolios, and pocketbooks.

The trade-mark is usually displayed by printing same on labels which are attached to packages containing the goods.

Said trade-mark has been registered in France, dated Oct. 29, 1908, renewed Aug. 3, 1923, No. 219,490. Mock & Blum, whose postal address is 10 East 40th Street, New York, N. Y., are designated, as applicant's representative, on whom process or notice of proceedings affecting the right of ownership of said trade-mark brought under the laws of the United States may be served.

VUITTON & VUITTON, SOCIETE A  
RESPONSABILITE LIMITEE,  
By G. L. VUITTON,  
Managing Director.

Int. Cl.: 18

Prior U.S. Cl.: 3

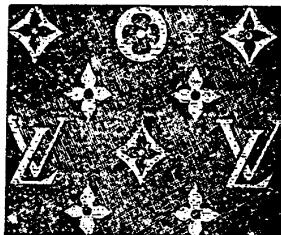
United States Patent and Trademark Office  
10 Year Renewal

Reg. No. 297,594

Registered Sep. 20, 1932

Renewal Term Begins Sep. 20, 1992

TRADEMARK  
PRINCIPAL REGISTER



LOUIS VUITTON MALLETIER  
(FRANCE CORPORATION)  
54, AVENUE MONTAIGNE  
75008 PARIS, FRANCE, BY CHANGE OF  
NAME, ASSIGNMENT, ASSIGNMENT  
AND ASSIGNMENT FROM VUITTON  
& VUITTON, SOCIETE A RESPONSABILITE  
LIMITEE (FRANCE CORPORATION) PARIS, FRANCE

OWNER OF FRANCE REG. NO.  
219,497, DATED 10-29-1908, RENEWED  
AS REG. NO. 219,497, DATED 8-3-1923.

THE REPRESENTATION OF A  
TRUCK LINING OR A SECTION  
THEREOF BEING HEREBY DIS-  
CLAIMED.

FOR: TRUNKS, VALISES, TRAVEL-  
ING BAGS, SATCHELS, HAT BOXES  
AND SHOE BOXES USED FOR LUG-  
GAGE, HAND BAGS, AND POCKET-  
BOOKS, IN CLASS 3 (INT. CL. 18).

FIRST USE 0-0-1897; IN COMMERCE  
0-0-1897.

SER. NO. 71-313,983, FILED 4-29-1931.

*In testimony whereof I have hereunto set my hand  
and caused the seal of The Patent and Trademark  
Office to be affixed on May 17, 1994.*

COMMISSIONER OF PATENTS AND TRADEMARKS

Ex. Cl. /8

Registered Sept. 20, 1932

297,594. "VL" AND DRAWING. Registered Sept. 20, 1932. Vuitton & Vuitton, Societe a Responsabilite Limitee, Paris, France. Renewed Sept. 20, 1952, to Vuitton & Vuitton, Societe a Responsabilite Limitee, Seine, France, a corporation organized under the laws of the Republic of France. Trunks, Valises, Traveling Bags, Etc. Class 3.

Trade-Mark 297,594

SECOND RENEWAL

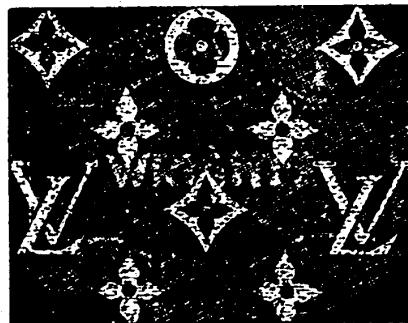
Vuitton et fils Societe a Responsabilite Limitee  
des Hauts de Seine France

# UNITED STATES PATENT OFFICE

35  
VUITTON & VUITTON, SOCIETE A RESPONSABILITE LIMITEE, OF PARIS, FRANCE

ACT OF FEBRUARY 20, 1905

Application filed April 29, 1931. Serial No. 313,983.



## STATEMENT

To all whom it may concern:

Be it known that Vuitton & Vuitton, Societe a Responsabilite Limitee, a corporation duly organized under the laws of the Republic of France, located in the city of Paris, France, and doing business at 70 Avenue des Champs-Elysees, in said city, has adopted for its use the trade-mark shown in the accompanying drawings the representation of a trunk lining or a section thereof being hereby claimed.

The trade-mark has been continuously used in its business since 1897.

The particular description of goods to which the trade-mark is appropriated is TRUNKS, VALISES, TRAVELING BAGS, SATCHELS, HAT BOXES AND SHOE BOXES USED FOR LUGGAGE, HAND BAGS, AND POCKETBOOKS, comprised in Class 3, Baggage, animal equipments, portfolios, and pocketbooks

The trade-mark is usually displayed by stamping or otherwise impressing same directly upon the goods or by printing or otherwise impressing same on packages containing the goods.

Said trade-mark has been registered in France dated Oct. 29, 1908, renewed Aug. 3, 1923, No. 219,497. Mock & Blum, whose postal address is 10 East 40th Street, New York, N. Y., are designated, as applicant's representative, on whom process or notice of proceedings affecting the right of ownership of said trade-mark brought under the laws of the United States may be served.

VUITTON & VUITTON, SOCIETE  
a RESPONSABILITE LIMITEE,  
By G. L. VUITTON,  
Managing Director.

Registered Sept. 20, 1932

Trade-Mark 297,594

Renewed September 20, 1952 to Vuitton & Vuitton, Societe a Responsabilite Limitee, of Seine, France, a corporation organized under the laws of the Republic of France.

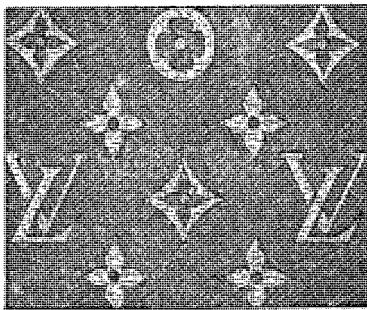
3515

## UNITED STATES PATENT OFFICE

VUITTON & VUITTON, SOCIETE A RESPONSABILITE LIMITEE, OF PARIS, FRANCE

ACT OF FEBRUARY 20, 1905

Application filed April 29, 1931. Serial No. 313,983.



### STATEMENT

*To all whom it may concern:*

Be it known that Vuitton & Vuitton, Societe a Responsabilite Limitee, a corporation duly organized under the laws of the Republic of France, located in the city of Paris, France, and doing business at 70 Avenue des Champs-Elysees, in said city, has adopted for its use the trade-mark shown in the accompanying drawing, the representation of a trunk lining or a section thereof being hereby disclaimed.

The trade-mark has been continuously used in its business since 1897.

The particular description of goods to which the trade-mark is appropriated is TRUNKS, VALISES, TRAVELING BAGS, SATCHELS, HAT BOXES AND SHOE BOXES USED FOR LUGGAGE, HAND BAGS, AND POCKETBOOKS, comprised in Class 3, Baggage, animal equipments, portfolios, and pocketbooks..

The trade-mark is usually displayed by stamping or otherwise impressing same directly upon the goods or by printing or otherwise impressing same on packages containing the goods.

Said trade-mark has been registered in France dated Oct. 29, 1908, renewed Aug. 3, 1923, No. 219,497. Mock & Blum, whose postal address is 10 East 40th Street, New York, N. Y., are designated, as applicant's representative, on whom process or notice of proceedings affecting the right of ownership of said trade-mark brought under the laws of the United States may be served.

VUITTON & VUITTON, SOCIETE  
a RESPONSABILITE LIMITEE,  
By G. L. VUITTON,  
Managing Director.

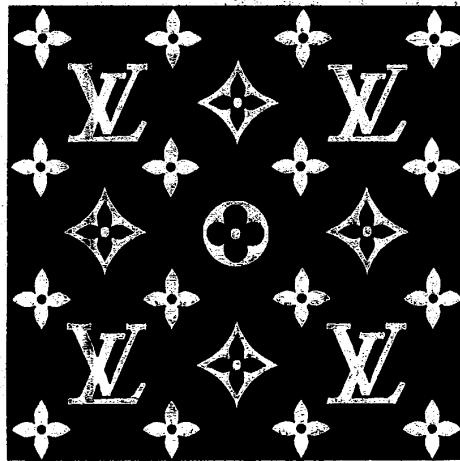
Int. Cl.: 25

Prior U.S. Cl.: 39

Reg. No. 1,770,131

United States Patent and Trademark Office Registered May 11, 1993

TRADEMARK  
PRINCIPAL REGISTER



LOUIS VUITTON (FRANCE CORPORATION)  
54 AVENUE MONTAIGNE  
75008 PARIS, FRANCE

OWNER OF FRANCE REG. NO. 1498338,  
DATED 11-15-1988, EXPIRES 11-15-1998.  
OWNER OF U.S. REG. NO. 1,415,502.

FOR: CLOTHING FOR MEN AND WOMEN;  
NAMELY, BELTS, SHAWLS, SASHES,  
SCARVES; FOOTWEAR, TIPS FOR FOOT-  
WEAR; HEADGEAR, IN CLASS 25 (U.S. CL. 39).

SER. NO. 74-148,017, FILED 3-15-1991.

PATRICK, LEVY, EXAMINING ATTORNEY

Int. Cl.: 25

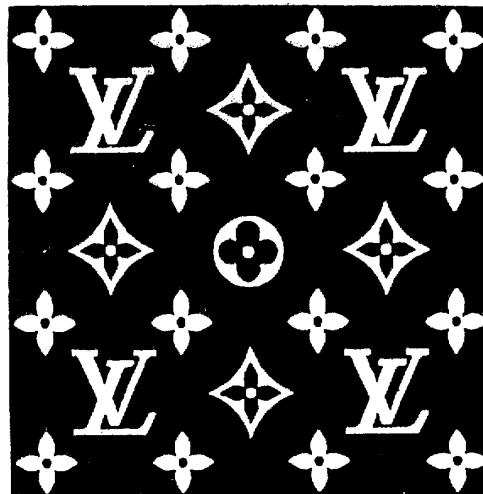
Prior U.S. Cls.: 22 and 39

Reg. No. 2,399,161

**United States Patent and Trademark Office**

Registered Oct. 31, 2000

TRADEMARK  
PRINCIPAL REGISTER



LOUIS VUITTON MALLETIER (FRANCE CORPORATION)  
2 RUE DU PONT-NEUF  
75001 PARIS, FRANCE

FOR: CLOTHING AND UNDERWEAR, NAMELY, SWEATERS, SHIRTS, SWEATSHIRTS, POLO SHIRTS, T-SHIRTS, CORSETS, SUITS, WAISTCOATS, RAINCOATS, SKIRTS, COATS, PULLOVERS, TROUSERS, DRESSES, JACKETS, SHAWLS, STOLES, SASHES FOR WEAR, SCARVES, NECKTIES, POCKET SQUARES, SUSPENDERS, POCKET HANDKERCHIEFS, BRACES, GLOVES, TIES, BELTS, STOCKINGS, TIGHTS, SOCKS, BATH ROBES, BATHING SUITS, SHOES, BOOTS AND SANDALS,

TIPS FOR FOOTWEAR; HATS AND CAPS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 0-0-1896; IN COMMERCE 0-0-1981.  
OWNER OF U.S. REG. NOS. 1,655,564, 1,875,198  
AND OTHERS.

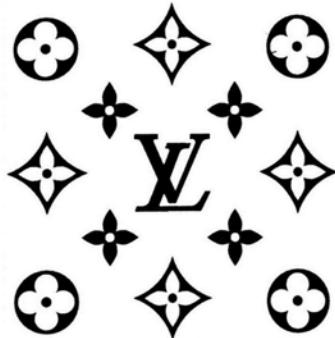
THE MARK CONSISTS OF A REPEATING PATTERN DESIGN COVERING ALL OR SUBSTANTIALLY ALL OF THE SURFACE OF THE GOODS. THE MARK INCLUDES THE LETTERS LV AND FLOWER-LIKE DESIGNS ON A DARK BACKGROUND.

SER. NO. 75-620,248, FILED 1-13-1999.

INGRID C. EULIN, EXAMINING ATTORNEY

# United States of America

## United States Patent and Trademark Office



**Reg. No. 4,192,541**

LOUIS VUITTON MALLETIER (FRANCE SOCIÉTÉ ANONYME)  
2 RUE DU PONT-NEUF  
PARIS, FRANCE F75001

**Registered Aug. 21, 2012**

**Int. Cls.: 3, 9, 14, 16, 18, 24, 25 and 34**

FOR: SOAPS FOR PERSONAL USE; PERFUMERY; ESSENTIAL OILS; COSMETICS; CREAMS FOR THE HAIR, FACE, AND BODY; LOTIONS FOR THE HAIR, FACE, AND BODY; SHOWER AND BATH GELS; SHOWER AND BATH PREPARATIONS; SHAMPOOS; MAKE-UP PREPARATIONS, NAMELY, FOUNDATIONS, LIPSTICKS, EYE SHADOWS, MASCARA, MAKE-UP POWDER, AND NAIL POLISH, IN CLASS 3 (U.S. CLS. 1, 4, 6, 50, 51 AND 52).

### TRADEMARK

### PRINCIPAL REGISTER

FOR: SUNGLASSES; SPECTACLES; OPTICAL LENSES; SPECTACLE CASES; TELEPHONES; MOBILE TELEPHONES; SMART PHONES; PC TABLETS; PERSONAL DIGITAL ASSISTANTS; MP3 PLAYERS; ACCESSORIES FOR TELEPHONES, MOBILE TELEPHONES, SMART PHONES, PC TABLETS, PERSONAL DIGITAL ASSISTANTS, AND MP3 PLAYERS, NAMELY, HANDS-FREE KITS FOR TELEPHONES, BATTERIES, COVERS, HOUSINGS, FAÇADES, CHARGERS, HAND STRAPS, AND NECK STRAPS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FOR: JEWELRY; KEY RINGS OF PRECIOUS METAL; TIE PINS; MEDALLIONS; JEWELRY BOXES; WATCHES; WATCH BANDS; ALARM CLOCKS; CASES FOR TIMEPIECES, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FOR: PRINTED MATTER, NAMELY, PAMPHLETS, CATALOGS, AND BOOKS IN THE FIELD OF TRAVEL, LUGGAGE, LUXURY GOODS, FASHION, CLOTHING, SPORTS, THE ARTS; PUBLICATIONS, NAMELY, BROCHURES AND BOOKLETS IN THE FIELD OF TRAVEL, LUGGAGE, LUXURY GOODS, FASHION, CLOTHING, SPORTS, THE ARTS; STATIONERY; STATIONERY ARTICLES, NAMELY, NOTE PADS, WRITING BOOKS, DRAWING BOOKS, CALENDARS, AGENDAS, NOTEBOOKS, ENVELOPES, LETTER PAPER, AND INDEX CARDS; COVERS FOR DIARIES, INDEXES, AND PADS; OFFICE REQUISITES, NAMELY, LETTER TRAYS, PAPER CUTTERS, PENCILS, INKSTANDS, INKWELLS, PAPERWEIGHTS, PENCIL HOLDERS, PEN HOLDERS, WRITING PADS, PENS, BALLS, AND NIBS FOR PENS; POSTCARDS; PAPER LABELS; NEWSPAPERS; PRINTED DOCUMENTS, NAMELY, PRINTED CERTIFICATES, IN CLASS 16 (U.S. CLS. 2, 5, 22, 23, 29, 37, 38 AND 50).

FOR: BOXES OF LEATHER OR IMITATION LEATHER FOR PACKAGING AND CARRYING GOODS; TRAVELING BAGS; LEATHER TRAVELING SETS OF LUGGAGE; TRUNKS;



*David J. Kappas*

Director of the United States Patent and Trademark Office

**Reg. No. 4,192,541** SUITCASES; GARMENT BAGS FOR TRAVEL; VANITY CASES SOLD EMPTY; TOILETRY BAGS SOLD EMPTY; BACKPACKS; HANDBAGS; ATTACHÉ CASES; LEATHER DOCUMENT CASES; WALLETS; PURSES; LEATHER KEY CASES; UMBRELLAS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FOR: TEXTILES AND TEXTILE GOODS, NAMELY, BATH LINEN, BED LINEN, TABLE LINEN, TOWELS, BED COVERS, TEXTILE TABLE CLOTHS, IN CLASS 24 (U.S. CLS. 42 AND 50).

FOR: CLOTHING, NAMELY, UNDERWEAR, SHIRTS, TEE-SHIRTS, PULLOVERS, SKIRTS, DRESSES, TROUSERS, COATS, JACKETS, BELTS FOR CLOTHING, SCARVES, SASHES FOR WEAR, GLOVES, NECKTIES, SOCKS, BATHING SUITS; FOOTWEAR; HEADWEAR, IN CLASS 25 (U.S. CLS. 22 AND 39).

FOR: CIGAR AND CIGARETTE CASES OF LEATHER AND IMITATION LEATHER, IN CLASS 34 (U.S. CLS. 2, 8, 9 AND 17).

OWNER OF U.S. REG. NOS. 1,875,198, 2,361,695 AND OTHERS.

PRIORITY DATE OF 3-28-2011 IS CLAIMED.

OWNER OF INTERNATIONAL REGISTRATION 1095708 DATED 9-19-2011, EXPIRES 9-19-2021.

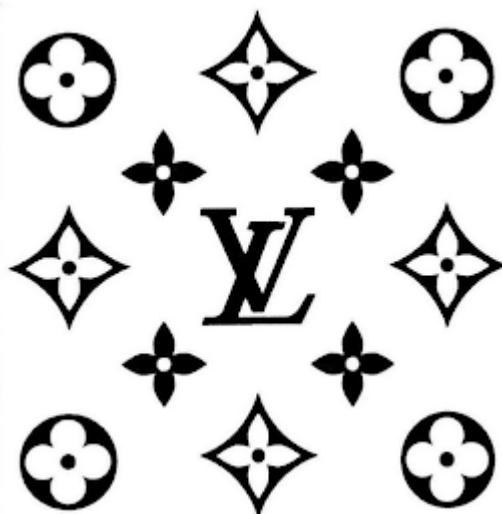
THE MARK CONSISTS OF FLOWER-LIKE DESIGNS SURROUNDING THE LETTERS "LV".

SER. NO. 79-104,538, FILED 9-19-2011.

HOWARD SMIGA, EXAMINING ATTORNEY

# United States of America

## United States Patent and Trademark Office



**Reg. No. 6,874,887**

**Registered Oct. 18, 2022**

**Int. Cl.: 10**

**Trademark**

**Principal Register**

Louis Vuitton Malletier (FRANCE société par actions simplifiée (sas) )

2 rue du Pont Neuf

Paris, FRANCE 75001

CLASS 10: face shields for protection against viral infection; fashion face masks being sanitary masks for protection against viral infection; face coverings incorporating protective chin shields being sanitary masks for protection against viral infection; protective gloves for medical use; Face masks for medical use; Surgical masks; protective face shields for medical use; protective chin shields for medical use; gloves for medical use

OWNER OF EUROPEAN UNION , REG. NO. 018324529, DATED 02-27-2021,  
EXPIRES 10-22-2030

PRIORITY CLAIMED UNDER SEC. 44(D) ON FRANCE APPLICATION NO. 018253142, FILED 06-12-2020

The mark consists of a repeating pattern of the monogram "LV", pointed four-petaled flowers, pointed four-petaled flowers within diamond carriers, and rounded four-petaled flowers within circular carriers. The mark appears over the entire surface of the goods.

SER. NO. 90-304,024, FILED 11-06-2020



*Katherine Kelly Vidal*

Director of the United States  
Patent and Trademark Office



**Int. Cls.: 14, 18 and 25**

**Prior U.S. Cls.: 1, 2, 3, 22, 27, 28, 39, 41 and 50**

**Reg. No. 2,177,828**

**United States Patent and Trademark Office**

**Registered Aug. 4, 1998**

**TRADEMARK  
PRINCIPAL REGISTER**



**LOUIS VUITTON MALLETIER (FRANCE CORPORATION)**  
54, AVENUE MONTAIGNE  
75008 PARIS, FRANCE

**FOR: GOODS MADE OF PRECIOUS METALS, NAMELY, SHOE ORNAMENTS, HAT ORNAMENTS, ORNAMENTAL PINS, ASH-TRAYS FOR SMOKERS, DECORATIVE BOXES, POWDER COMPACTS OF PRECIOUS METAL, JEWELRY CASES; JEWELRY, NAMELY, RINGS, KEY RINGS, BELT BUCKLES, EAR RINGS, CUFFLINKS, BRACELETS, CHARMS, BROOCHES, NECKLACES, TIE PINS, MEDALLIONS; HOROLOGICAL AND CHRONOMETRIC INSTRUMENTS, STRAPS FOR WATCHES, WATCHES AND WRIST-WATCHES, CASES FOR WATCHES, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).**

**FOR: GOODS MADE OF LEATHER OR IMITATIONS OF LEATHER ARE NOT INCLUDED IN OTHER CLASSES, NAMELY, BOXES MADE FROM LEATHER OR LEATHERBOARD, ENVELOPES OF LEATHER FOR PACKAGING; TRUNKS, VALISES, TRAVELING BAGS, LUGGAGE FOR TRAVEL, GARMENT BAGS FOR TRAVEL, VANITY CASES SOLD EMPTY, RUCKSACKS, HAND BAGS, BEACH BAGS, SHOPPING BAGS, SHOULDER BAGS, ATTACH-**

**CHE CASES, BRIEFCASES, DRAW STRING POUCHES, AND FINE LEATHER GOODS, NAMELY, POCKET WALLETS, PURSES, LEATHER KEY HOLDERS, BUSINESS CARD CASES, CALLING CARD CASES, AND CREDIT CARD CASES, UMBRELLAS, PARASOLS, CANES, AND WALKING-STICK SEATS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).**

**FOR: CLOTHING AND UNDERWEAR, NAMELY, SWEATERS, SHIRTS, CORSETS, SUITS, WAISTCOATS, RAINCOATS, SKIRTS, COATS, PULLOVERS, TROUSERS, DRESSES, JACKETS, SHAWLS, STOLES, SASHES FOR WEAR, SCARVES, NECKTIES, POCKET SQUARES, SUSPENDERS, GLOVES, BELTS, STOCKINGS, TIGHTS, SOCKS, BATH ROBES, SHOES, BOOTS AND SANDALS, HATS AND CAPS, IN CLASS 25 (U.S. CLS. 22 AND 39).**

**PRIORITY CLAIMED UNDER SEC. 44(D) ON FRANCE APPLICATION NO. 96/612502, FILED 2-23-1996, REG. NO. 96612502, DATED 2-23-1996, EXPIRES 2-23-2006.**

**OWNER OF U.S. REG. NOS. 1,643,625, 1,875,198 AND OTHERS.**

**SER. NO. 75-143,799, FILED 8-1-1996.**

**JASON TURNER, EXAMINING ATTORNEY**

Int. Cl.: 9

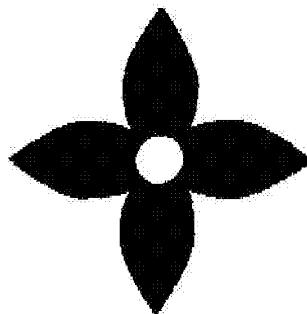
Prior U.S. Cls.: 21, 23, 26, 36 and 38

United States Patent and Trademark Office

Reg. No. 3,021,231

Registered Nov. 29, 2005

TRADEMARK  
PRINCIPAL REGISTER



LOUIS VUITTON MALLETIER (FRANCE SOCIÉTÉ ANONYME)

2, RUE DU PONT-NEUF

F-75001 PARIS, FRANCE

FOR: SPECTACLES, SUNGLASSES AND SPECTACLE CASES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

PRIORITY DATE OF 7-30-2004 IS CLAIMED.

OWNER OF INTERNATIONAL REGISTRATION  
0843151 DATED 1-27-2005, EXPIRES 1-27-2015.

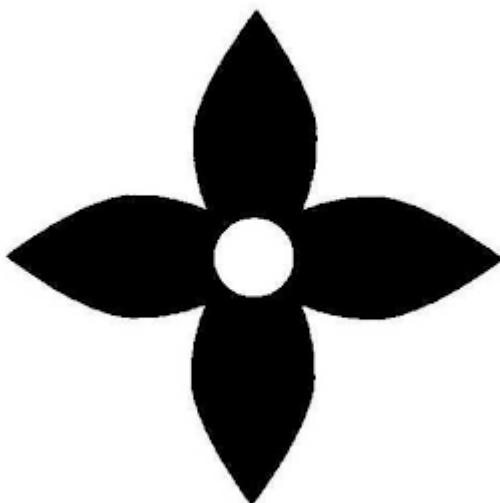
OWNER OF U.S. REG. NOS. 1,841,850, 2,399,161  
AND OTHERS.

SER. NO. 79-008,818, FILED 1-27-2005.

BRIDGETT SMITH, EXAMINING ATTORNEY

# United States of America

## United States Patent and Trademark Office



**Reg. No. 6,952,203**

**Registered Jan. 17, 2023**

**Int. Cl.: 9, 10**

**Trademark**

**Principal Register**

Louis Vuitton Malletier (FRANCE société par actions simplifiée (sas) )  
2 rue du Pont Neuf  
Paris, FRANCE 75001

CLASS 9: Eyewear; sunglasses; spectacles; spectacle frames; spectacle lenses; spectacle cords; spectacle cases; containers for contact lenses; sleeves for laptops; bags adapted for laptops; covers for smartphones; cases for smartphones; Hand grips, rings and stands adapted for smartphones, all the foregoing being holders specifically adapted for smartphones; mouse pads; binoculars; apparatus and instruments for recording, transmitting, reproducing or processing of sound or images; loudspeakers; headphones; earphones; hands-free kits for telephones; smartwatches; downloadable computer software applications for providing information in the fields of shoes, body and air fragrances, cosmetics, leather goods, handbags, luggage, trunks, product restoration, jewelry, watchmaking, connected devices, ready to wear, fashion accessories, fashion and culture, exhibitions, books, note books, periodicals, home furniture; downloadable computer software applications for displaying products in the fields of shoes, body and air fragrances, cosmetics, leather goods, handbags, luggage, trunks, jewelry, watchmaking, connected devices, ready to wear, fashion accessories, fashion, books, note books, periodicals, home furniture; blank USB flash drives; portable media players; downloadable graphics for mobile phones; downloadable emoticons for mobile phones

CLASS 10: Protective face shields for medical use; protective face shields in the nature of protective face masks for medical use; protective face shields in the nature of protective masks being face masks for protection against viral infection; protective face shields being face shields for protection against viral infection

OWNER OF FRANCE , REG. NO. 204707320, DATED 11-30-2020, EXPIRES 11-30-2031

The mark consists of a four petal flower.

SER. NO. 90-356,804, FILED 12-03-2020



*Katherine Kelly Vidal*  
Director of the United States  
Patent and Trademark Office



**Int. Cls.: 14, 18 and 25**

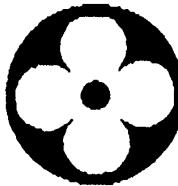
**Prior U.S. Cls.: 1, 2, 3, 22, 27, 28, 39, 41 and 50**

**Reg. No. 2,181,753**

**United States Patent and Trademark Office**

**Registered Aug. 18, 1998**

**TRADEMARK  
PRINCIPAL REGISTER**



**LOUIS VUITTON MALLETIER (FRANCE CORPORATION)**  
54, AVENUE MONTAIGNE  
75008 PARIS, FRANCE

FOR: GOODS MADE OF PRECIOUS METALS, NAMELY, SHOE ORNAMENTS, HAT ORNAMENTS, ORNAMENTAL PINS, ASH-TRAYS FOR SMOKERS, DECORATIVE BOXES, POWDER COMPACTS OF PRECIOUS METAL, JEWELRY CASES; JEWELRY, NAMELY, RINGS, KEY RINGS, BELT BUCKLES, EAR RINGS, CUFFLINKS, BRACELETS, CHARMS, BROOCHES, NECKLACES, TIE PINS, MEDALLIONS; HOROLOGICAL AND CHRONOMETRIC INSTRUMENTS, STRAPS FOR WATCHES, WATCHES AND WRIST-WATCHES, CASES FOR WATCHES, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FOR: GOODS MADE OF LEATHER OR IMITATIONS OF LEATHER ARE NOT INCLUDED IN OTHER CLASSES, NAMELY, BOXES MADE FROM LEATHER OR LEATHERBOARD, ENVELOPES OF LEATHER FOR PACKAGING; TRUNKS, VALISES, TRAVELING BAGS, LUGGAGE FOR TRAVEL, GARMENT BAGS FOR TRAVEL, VANITY CASES SOLD EMPTY, RUCKSACKS, HAND BAGS, BEACH BAGS, SHOPPING BAGS, SHOULDER BAGS, ATTACH-

CHE CASES, BRIEFCASES, DRAW STRING POUCHES; AND FINE LEATHER GOODS, NAMELY, POCKET WALLETS, PURSES, LEATHER KEY HOLDERS, BUSINESS CARD CASES, CALLING CARD CASES, AND CREDIT CARD CASES, UMBRELLAS, PARASOLS, CANES, AND WALKING-STICK SEATS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FOR: CLOTHING AND UNDERWEAR, NAMELY, SWEATERS, SHIRTS, CORSETS, SUITS, WAISTCOATS, RAINCOATS, SKIRTS, COATS, PULLOVERS, TROUSERS, DRESSES, JACKETS, SHAWLS, STOLES, SASHES FOR WEAR, SCARVES, NECKTIES, POCKET SQUARES, SUSPENDERS, GLOVES, BELTS, STOCKINGS, TIGHTS, SOCKS, BATH ROBES, SHOES, BOOTS AND SANDALS, HATS AND CAPS, IN CLASS 25 (U.S. CLS. 22 AND 39).

PRIORITY CLAIMED UNDER SEC. 44(D) ON FRANCE APPLICATION NO. 96/612504, FILED 2-23-1996, REG. NO. 96612504, DATED 2-23-1996, EXPIRES 2-23-2006.

OWNER OF U.S. REG. NOS. 1,643,625, 1,875,198 AND OTHERS.

SER. NO. 75-143,789, FILED 8-1-1996.

JASON TURNER, EXAMINING ATTORNEY

Int. Cl.: 9

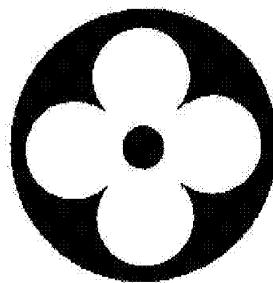
Prior U.S. Cls.: 21, 23, 26, 36 and 38

United States Patent and Trademark Office

Reg. No. 3,023,930

Registered Dec. 6, 2005

TRADEMARK  
PRINCIPAL REGISTER



LOUIS VUITTON MALLETIER (FRANCE SOCIÉTÉ ANONYME)

2, RUE DU PONT-NEUF

F-75001 PARIS, FRANCE

FOR: SPECTACLES, SUNGLASSES AND SPECTACLE CASES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

PRIORITY DATE OF 7-30-2004 IS CLAIMED.

OWNER OF INTERNATIONAL REGISTRATION  
0843152 DATED 1-27-2005, EXPIRES 1-27-2015.

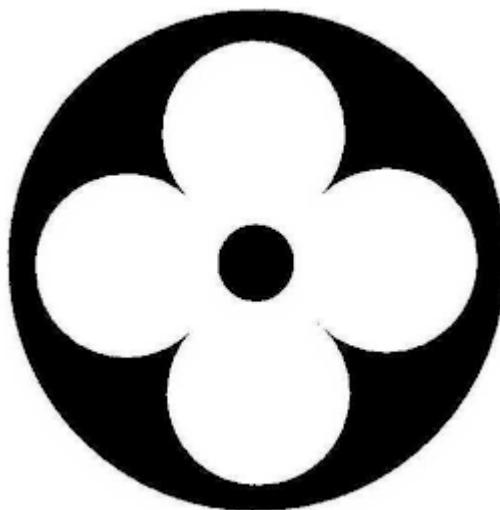
OWNER OF U.S. REG. NOS. 1,841,850, 2,399,161  
AND OTHERS.

SER. NO. 79-008,819, FILED 1-27-2005.

BRIDGETT SMITH, EXAMINING ATTORNEY

# United States of America

## United States Patent and Trademark Office



**Reg. No. 6,952,204**

**Registered Jan. 17, 2023**

**Int. Cl.: 9, 10**

**Trademark**

**Principal Register**

Louis Vuitton Malletier (FRANCE société par actions simplifiée (sas) )  
2 rue du Pont Neuf  
Paris, FRANCE 75001

CLASS 9: Eyewear; sunglasses; spectacles; spectacle frames; spectacle lenses; spectacle cords; spectacle cases; containers for contact lenses; sleeves for laptops; bags adapted for laptops; covers for smartphones; cases for smartphones; Hand grips, rings and stands adapted for smartphones, all the foregoing being holders specifically adapted for smartphones; mouse pads; binoculars; apparatus and instruments for recording, transmitting, reproducing or processing of sound or images; loudspeakers; headphones; earphones; hands-free kits for telephones; smartwatches; downloadable computer software applications for providing information in the fields of shoes, body and air fragrances, cosmetics, leather goods, handbags, luggage, trunks, product restoration, jewelry, watchmaking, connected devices, ready to wear, fashion accessories, fashion and culture, exhibitions, books, note books, periodicals, home furniture; downloadable computer software applications for displaying products in the fields of shoes, body and air fragrances, cosmetics, leather goods, handbags, luggage, trunks, jewelry, watchmaking, connected devices, ready to wear, fashion accessories, fashion, books, note books, periodicals, home furniture; blank USB flash drives; portable media players; downloadable graphics for mobile phones; downloadable emoticons for mobile phones

CLASS 10: Protective face shields for medical use; protective face shields in the nature of protective face masks for medical use; protective face shields in the nature of protective masks being face masks for protection against viral infection; protective face shields being face shields for protection against viral infection

OWNER OF FRANCE , REG. NO. 204707327, DATED 11-30-2020, EXPIRES 11-30-2031

The mark consists of a four petal flower within a circle.

SER. NO. 90-356,842, FILED 12-03-2020



*Katherine Kelly Vidal*  
Director of the United States  
Patent and Trademark Office



**Int. Cls.: 14, 18 and 25**

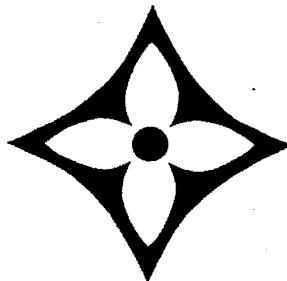
**Prior U.S. Cls.: 1, 2, 3, 22, 27, 28, 39, 41 and 50**

**Reg. No. 2,773,107**

Registered Oct. 14, 2003

**United States Patent and Trademark Office**

**TRADEMARK  
PRINCIPAL REGISTER**



LOUIS VUITTON MALLETIER (FRANCE CORPORATION)  
2, RUE DU PONT-NEUF  
75001 PARIS, FRANCE

FOR: JEWELRY INCLUDING RINGS, BELT BUCKLES OF PRECIOUS METALS, EARRINGS, CUFF LINKS, BRACELETS, CHARMS, BROOCHES, NECKLACES, TIE PINS, ORNAMENTAL PINS, AND MEDALLIONS; HORLOGICAL AND CHRONOMETRIC INSTRUMENTS AND APPARATUS, NAMELY, WATCHES, WATCH CASES AND CLOCKS; NUTCRACKERS OF PRECIOUS METALS; CANDLESTICKS OF PRECIOUS METALS, JEWELRY BOXES OF PRECIOUS METALS, IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).

FIRST USE 0-0-1999; IN COMMERCE 0-0-1999.

FOR: TRAVEL BAGS, TRAVEL BAGS MADE OF LEATHER; LUGGAGE TRUNKS AND VALISES, GARMENT BAGS FOR TRAVEL, VANITY-CASES SOLD EMPTY; RUCKSACKS, SHOULDER BAGS, HANDBAGS; ATTACHE-CASES, BRIEFCASES, DRAWSTRING POUCHES, POCKET WALLETS, PURSES, UMBRELLAS, BUSINESS CARD CASES MADE OF LEATHER OR OF IMITATION LEATHER, CREDIT CARD CASES MADE OF LEATHER

OR OF IMITATION LEATHER; CALLING CARD CASES MADE OF LEATHER OR OF IMITATION LEATHER, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 0-0-1899; IN COMMERCE 0-0-1899.

FOR: CLOTHING, NAMELY, UNDERWEAR, SWEATERS, SHIRTS, T-SHIRTS, SUITS, HOSIERY, BELTS, SCARVES, NECK TIES, SHAWLS, WAIST-COATS, SKIRTS, RAINCOATS, OVERCOATS, SUSPENDERS, TROUSERS, JEANS, PULLOVERS, FROCKS, JACKETS, WINTER GLOVES, DRESS GLOVES, TIGHTS, SOCKS, BATHING SUITS, BATH ROBES, PAJAMAS, NIGHT DRESSES, SHORTS, POCKET SQUARES; HIGH-HEELED SHOES, LOW-HEELED SHOES, SANDALS, BOOTS, SLIPPERS, TENNIS SHOES; HATS, CAPS, HEADBANDS, IN CLASS 25 (U.S. CLS. 22 AND 39).

FIRST USE 0-0-1974; IN COMMERCE 0-0-1974.

OWNER OF U.S. REG. NO. 2,177,828.

SER. NO. 76-364,597, FILED 1-31-2002.

RUSS HERMAN, EXAMINING ATTORNEY

Int. Cl.: 9

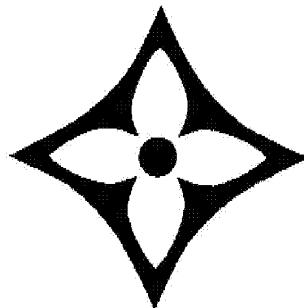
Prior U.S. Cls.: 21, 23, 26, 36 and 38

Reg. No. 3,051,235

United States Patent and Trademark Office

Registered Jan. 24, 2006

TRADEMARK  
PRINCIPAL REGISTER



LOUIS VUITTON MALLETIER (FRANCE SOCIÉTÉ ANONYME)  
2, RUE DU PONT-NEUF  
F-75001 PARIS  
FRANCE

OWNER OF INTERNATIONAL REGISTRATION  
0852773 DATED 1-27-2005, EXPIRES 1-27-2015.

FOR: SPECTACLES, SUNGLASSES AND SPECTACLE CASES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

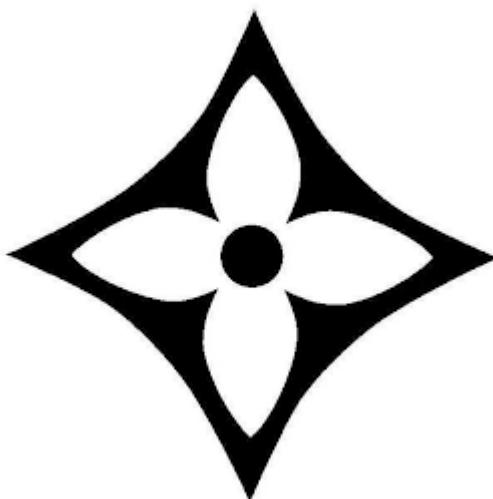
SER. NO. 79-011,931, FILED 1-27-2005.

PRIORITY DATE OF 7-30-2004 IS CLAIMED.

RICHARD A. STRASER, EXAMINING ATTORNEY

# United States of America

## United States Patent and Trademark Office



**Reg. No. 6,976,619**

**Registered Feb. 14, 2023**

**Int. Cl.: 9, 10**

**Trademark**

**Principal Register**

Louis Vuitton Malletier (FRANCE société par actions simplifiée (sas) )  
2 rue du Pont Neuf  
Paris, FRANCE 75001

CLASS 9: Eyewear; sunglasses; spectacles; spectacle frames; spectacle lenses; spectacle cords; spectacle cases; containers for contact lenses; sleeves for laptops; bags adapted for laptops; covers for smartphones; cases for smartphones; Hand grips, rings and stands adapted for smartphones, all the foregoing being holders specifically adapted for smartphones; mouse pads; binoculars; apparatus and instruments for recording, transmitting, reproducing or processing of sound or images; loudspeakers; headphones; earphones; hands-free kits for telephones; smartwatches; downloadable computer software applications for providing information in the fields of shoes, body and air fragrances, cosmetics, leather goods, handbags, luggage, trunks, product restoration, jewelry, watchmaking, connected devices, ready to wear, fashion accessories, fashion and culture, exhibitions, books, note books, periodicals, home furniture; downloadable computer software applications for displaying products in the fields of shoes, body and air fragrances, cosmetics, leather goods, handbags, luggage, trunks, jewelry, watchmaking, connected devices, ready to wear, fashion accessories, fashion, books, note books, periodicals, home furniture; blank USB flash drives; portable media players; downloadable graphics for mobile phones; downloadable emoticons for mobile phones

CLASS 10: Protective face shields for medical use; protective face shields in the nature of protective face masks for medical use; protective face shields in the nature of protective masks being face masks for protection against viral infection; protective face shields being face shields for protection against viral infection

OWNER OF FRANCE , REG. NO. 204707315, DATED 11-30-2020, EXPIRES 11-30-2030

The mark consists of a four petal flower in a diamond outline.

SER. NO. 90-356,877, FILED 12-03-2020



*Katherine Kelly Vidal*  
Director of the United States  
Patent and Trademark Office



Int. Cl.: 25

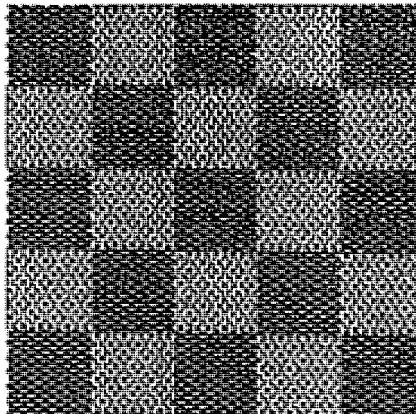
Prior U.S. Cls.: 22 and 39

Reg. No. 2,255,321

United States Patent and Trademark Office

Registered June 22, 1999

TRADEMARK  
PRINCIPAL REGISTER



LOUIS VUITTON MALLETIER (FRANCE CORPORATION)  
2, RUE DU PONT-NEUF  
75001 PARIS, FRANCE

FOR: CLOTHING, UNDERWEAR AND OTHER GARMENTS, NAMELY, SWEATERS, SHIRTS, BODICES, CORSETS, SUITS, WAIST-COATS, RAINCOATS, RAINWEAR, SKIRTS, COATS, TROUSERS, PULLOVERS, DRESSES, JACKETS, SHAWLS, SCARVES, SASHES FOR WEAR, TIES, POCKET HANDKERCHIEF SQUARES FOR WEAR, BRACES, CLOTHING GLOVES, CLOTHING BELTS, STOCKINGS, TIGHTS, SOCKS, BATHING SUITS, BATH-

ROBES, FOOTWEAR, AND HEADWEAR, IN CLASS 25 (U.S. CLS. 22 AND 39).

OWNER OF FRANCE REG. NO. 96/617953, DATED 3-27-1996, EXPIRES 3-27-2006.

OWNER OF U.S. REG. NO. 1,931,144 AND OTHERS.

THE COLORS LIGHT AND DARK BROWN ARE CLAIMED AS A FEATURE OF THE MARK. THE LINING CONSTITUTES A FEATURE OF THE MARK AND, ITSELF, DOES NOT INDICATE COLOR AS DESCRIBED AND CLAIMED HEREIN ABOVE.

THE MARK CONSISTS OF A SQUARE WITH A CHECKERED PATTERN OF LIGHT AND

2

2,255,321

DARK BROWN WITH THE UNUSUAL CONTRAST OF WEFT AND WARP.

SER. NO. 75-445,736, FILED 3-6-1998.

JENNIFER CHICOSKI, EXAMINING ATTORNEY

**Int. Cl.: 18**

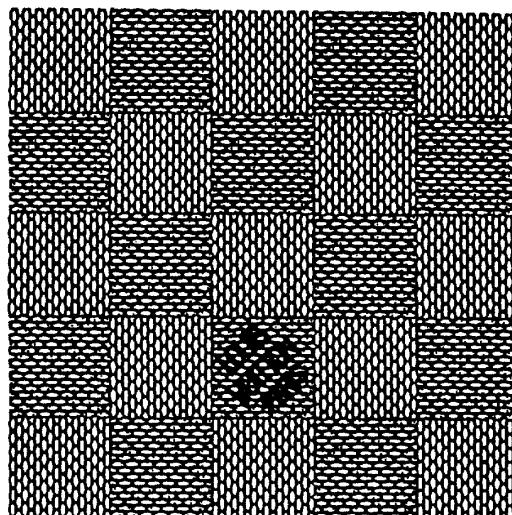
**Prior U.S. Cls.: 1, 2, 3, 22 and 41**

**Reg. No. 2,378,388**

**Registered Aug. 22, 2000**

**United States Patent and Trademark Office**

**TRADEMARK  
PRINCIPAL REGISTER**



LOUIS VUITTON MALLETIER (FRANCE CORPORATION)  
2, RUE DU PONT-NEUF  
75001 PARIS, FRANCE

FOR: GOODS MADE OF LEATHER OR IMITATIONS OF LEATHER NOT INCLUDED IN OTHER CLASSES NAMELY BOXES OF LEATHER OR LEATHER BOARD PRINCIPALLY USED FOR TRAVEL PURPOSES, ENVELOPES OF LEATHER FOR MERCHANDISE PACKAGING, TRUNKS, VALISES, TRAVELING BAGS, TRAVELING SETS FOR CONTAINING COSMETICS, JEWELRY AND STATIONERY, GARMENT BAGS FOR TRAVEL, VANITY CASES, RUCKSACKS, HANDBAGS, BEACH BAGS, SHOPPING BAGS, SHOULDER BAGS, ATTACHE-CASES, BRIEF CASES, POUCHES, FINE LEATHER GOODS NAMELY, POCKET WALLETS, PURSES,

KEY CASES, BUSINESS CARD CASES, CREDIT CARD CASES, CALLING CARD CASES, PARASOLS, UMBRELLAS, CANES, WALKING-STICK SEATS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 7-0-1996; IN COMMERCE 7-0-1996.

OWNER OF U.S. REG. NOS. 1,615,681, 2,177,841 AND OTHERS.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "PARIS", APART FROM THE MARK AS SHOWN.

THE COLORS LIGHT AND DARK BROWN ARE CLAIMED AS A FEATURE OF THE MARK. THE LINING CONSTITUTES A FEATURE OF THE MARK AND, ITSELF, DOES NOT INDICATE COLOR AS DESCRIBED AND CLAIMED HEREIN ABOVE.

THE NAME "LOUIS VUITTON" DOES NOT IDENTIFY A PARTICULAR LIVING INDIVIDUAL.

**2,378,388**

THE MARK CONSISTS OF A SQUARE WITH A BROWN WITH THE UNUSUAL CONTRAST OF  
CHECKERED PATTERN OF LIGHT AND DARK WEFT AND WARP.

SER. NO. 75-366,585, FILED 10-1-1997.

JENNIFER CHICOSKI, EXAMINING ATTORNEY

**Int. Cl.: 18**

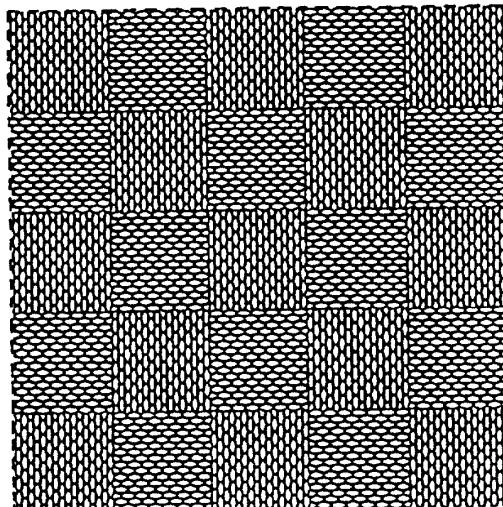
**Prior U.S. Cls.: 1, 2, 3, 22, and 41**

**Reg. No. 2,421,618**

**Registered Jan. 16, 2001**

**United States Patent and Trademark Office**

**TRADEMARK  
PRINCIPAL REGISTER**



LOUIS VUITTON MALLETIER (FRANCE CORPORATION)  
54, AVENUE MONTAIGNE  
75008 PARIS, FRANCE

FOR: GOODS MADE OF LEATHER OR IMITATIONS OF LEATHER NOT INCLUDED IN OTHER CLASSES, NAMELY, BOXES OF LEATHER OR LEATHER BOARD PRINCIPALLY USED FOR TRAVEL PURPOSES, ENVELOPES OF LEATHER FOR MERCHANDISE PACKAGING, TRUNKS, VALISES, TRAVELING BAGS, TRAVELING SETS FOR CONTAINING COSMETICS, JEWELRY AND STATIONERY, GARMENT BAGS FOR TRAVEL, VANITY CASES, RUCKSACKS, HANDBAGS, BEACH BAGS, SHOPPING BAGS, SHOULDER BAGS, ATTACHE-

CASES, BRIEF CASES, POUCHES, FINE LEATHER GOODS, NAMELY, POCKET WALLETS, PURSES, KEY CASES, BUSINESS CARD CASES, CREDIT CARD CASES, CALLING CARD CASES, PARASOLS, UMBRELLAS, CANES, WALKING-STICK SEATS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 6-0-1996; IN COMMERCE 8-0-1996.  
PRIORITY CLAIMED UNDER SEC. 44(D) ON  
FRANCE APPLICATION NO. 96617953, FILED  
3-27-1996, REG. NO. 96617953, EXPIRES 3-27-2006.  
OWNER OF U.S. REG. NO. 1,931,144 AND OTHERS.

THE MARK CONSISTS OF A CHECKERED PATTERN OF LIGHT AND DARK BROWN WITH AN UNUSUAL CONTRAST OF WEFT AND WARP, AND COLOR IS CLAIMED AS A FEATURE OF THE

2,421,618

MARK. THE PATTERN APPEARS OVER SUBSTANTIALLY THE ENTIRE SURFACE OF THE GOODS. THE LINING CONSTITUTES A FEATURE OF THE MARK AND ITSELF DOES NOT INDICATE THE COLORS DESCRIBED ABOVE. THE MATTER SHOWN IN BROKEN LINES SERVES TO SHOW THE

POSITIONING OF THE PATTERN ON ONE OF THE GOODS, NAMELY, A WALLET.  
SEC. 2(F).

SN 75-173,234, FILED 9-27-1996.

TERESA M. RUPP, EXAMINING ATTORNEY

Int. Cl.: 18

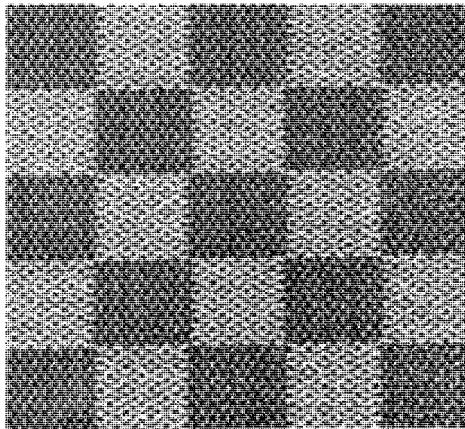
Prior U.S. Cls.: 1, 2, 3, 22 and 41

Reg. No. 3,576,404

**United States Patent and Trademark Office**

Registered Feb. 17, 2009

**TRADEMARK  
PRINCIPAL REGISTER**



LOUIS VUITTON MALLETIER (FRANCE SOCIETE ANONYME)  
2 RUE DU PONT-NEUF  
F-75001 PARIS  
FRANCE

FOR: BOXES OF LEATHER OR IMITATION LEATHER FOR PACKAGING AND CARRYING GOODS, TRUNKS, SUITCASES, TRAVELING SETS COMPRISED OF MATCHING LUGGAGE, TRAVELING BAGS, LUGGAGE, GARMENT BAGS FOR TRAVEL, HATBOXES NOT OF PAPER OR CARDBOARD, VANITY CASES NOT FITTED, TOILETRY CASES SOLD EMPTY, RUCKSACKS, SATCHELS, HANDBAGS, BEACH BAGS, LEATHER SHOPPING BAGS, TEXTILE SHOPPING BAGS, SLING BAGS, SUIT CARRIERS, SHOULDER BAGS, WAIST BAGS, PURSES, TRAVEL CASES, BRIEFCASES, BRIEF-CASE-TYPE PORTFOLIOS, LEATHER POUCHES, WALLETS, CHANGE PURSES, KEY CASES, BUSINESS CARD CASES, CALLING CARD CASES, UMBRELLAS, PARASOLS, ANIMAL CARRIER BAGS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

PRIORITY DATE OF 7-12-2007 IS CLAIMED.

OWNER OF INTERNATIONAL REGISTRATION 0952582 DATED 1-3-2008, EXPIRES 1-3-2018.

OWNER OF U.S. REG. NOS. 2,255,321 AND 2,421,618.

THE MARK CONSISTS OF SQUARES WITH A CHECKERED PATTERN OF LIGHT AND DARK WITH THE UNUSUAL CONTRAST OF WEFT AND WARP. COLOR IS NOT CLAIMED AS A FEATURE OF THE MARK. THE PATTERN APPEARS OVER SUBSTANTIALLY THE ENTIRE SURFACE OF THE GOODS. THE LINING CONSTITUTES A FEATURE OF THE MARK AND, ITSELF, DOES NOT INDICATE A SPECIFIC COLOR.

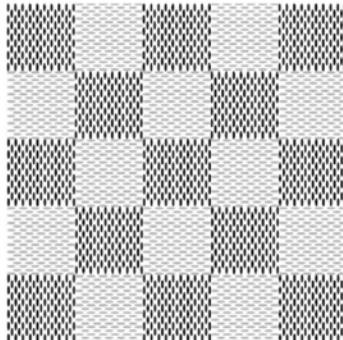
SEC. 2(F).

SER. NO. 79-049,581, FILED 1-3-2008.

FRED CARL, EXAMINING ATTORNEY

# United States of America

## United States Patent and Trademark Office



**Reg. No. 4,809,157**

**Registered Sep. 8, 2015**

**Int. Cl.: 9**

**TRADEMARK**

**PRINCIPAL REGISTER**

LOUIS VUITTON MALLETIER (FRANCE SOCIÉTÉ ANONYME)  
2, RUE DU PONT-NEUF  
PARIS, FRANCE F-75001

FOR: EYEWEAR, NAMELY, EYEGLASSES, EYEGLASS FRAMES, SUNGLASSES, SUNGLASS FRAMES; FITTED CASES AND PROTECTIVE COVERS FOR MOBILE PHONES, LAPTOPS, TABLET COMPUTERS, PDAS, MP3 PLAYERS, PORTABLE MEDIA PLAYERS; MOBILE PHONE STRAPS; BAGS AND CASES SPECIALLY ADAPTED FOR HOLDING OR CARRYING MOBILE PHONES AND MOBILE PHONE ACCESSORIES, LAPTOPS, TABLET COMPUTERS, PDAS, MP3 PLAYERS, PORTABLE MEDIA PLAYERS, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 1-16-2002; IN COMMERCE 1-16-2002.

OWNER OF U.S. REG. NOS. 2,255,321, 2,421,618, AND 3,576,404.

SEC. 2(F).

THE MARK CONSISTS OF SQUARES WITH A CHECKERED PATTERN OF LIGHT AND DARK WITH THE UNUSUAL CONTRAST OF WEFT AND WARP.

SN 86-071,559, FILED 9-23-2013.

SETH A. RAPPAPORT, EXAMINING ATTORNEY



*Michelle K. Lee*

Director of the United States  
Patent and Trademark Office

# United States of America

## United States Patent and Trademark Office



**Reg. No. 6,836,091**

**Registered Sep. 06, 2022**

**Int. Cl.: 18**

**Trademark**

**Principal Register**

LOUIS VUITTON MALLETIER (FRANCE société par actions simplifiée (sas) )

2 rue du Pont-Neuf  
Paris, FRANCE 75001

CLASS 18: Boxes of leather or imitation leather; travelling bags; leatherware in the nature of travelling bag sets; trunks being luggage; garment bags for travel purposes for clothes and shoes; vanity cases, not fitted; rucksacks; handbags; sport bags; attaché cases made of leather; briefcases made of leather; pocket wallets; wallets; change purses; business card cases; leatherware in the nature of key cases; parasols; umbrellas; pet clothing; bags for carrying animals

The color(s) light brown and dark brown is/are claimed as a feature of the mark.

PRIORITY CLAIMED UNDER SEC. 44(D) ON FRANCE APPLICATION NO. 4503382, FILED 11-27-2018, REG. NO. 4503382, DATED 11-27-2018, EXPIRES 11-27-2028

The mark consists of repeating, textured pattern as well as a repeating checkerboard pattern that covers the entire surface of the goods. The textured pattern is displayed in overlapping segments consisting of contrasting shades of brown and light brown in a weft and warp fashion which appear within alternating brown and light brown squares in a checkerboard pattern with the wording "LOUIS VUITTON PARIS" in light brown written in one square of each pattern segment on a dark brown square.

No claim is made to the exclusive right to use the following apart from the mark as shown: "PARIS"

The name(s), portrait(s), and/or signature(s) shown in the mark does not identify a particular living individual.

SER. NO. 88-445,756, FILED 05-24-2019



*Katherine Kelly Vidal*  
Director of the United States  
Patent and Trademark Office



# United States of America

## United States Patent and Trademark Office



**Reg. No. 6,836,090**

**Registered Sep. 06, 2022**

**Int. Cl.: 18**

**Trademark**

**Principal Register**

LOUIS VUITTON MALLETIER (FRANCE société par actions simplifiée (sas) )

2 rue du Pont-Neuf  
Paris, FRANCE 75001

CLASS 18: Boxes of leather or imitation leather; travelling bags; leatherware in the nature of travelling bag sets; trunks being luggage and suitcases; garment bags for travel purposes for clothes and shoes; vanity cases, not fitted; rucksacks; handbags; sport bags; clutches in the nature of evening purses; attaché cases made of leather; briefcases made of leather; pocket wallets; wallets; change purses; business card cases; leatherware in the nature of key cases; parasols; umbrellas; pet clothing; bags for carrying animals

The color(s) white, navy blue, and beige is/are claimed as a feature of the mark.

PRIORITY CLAIMED UNDER SEC. 44(D) ON FRANCE APPLICATION NO. 4503284, FILED 11-26-2018, REG. NO. 4503284, DATED 11-26-2018, EXPIRES 11-26-2028

The mark consists of repeating, textured pattern as well as a repeating checkerboard pattern that covers the entire surface of the goods. The textured pattern is displayed in overlapping segments consisting of contrasting shades of white, navy blue, and beige colors in a weft and warp fashion which appear within alternating dark and light squares in a checkerboard pattern with the wording "LOUIS VUITTON PARIS" in navy blue written in one square of each pattern segment on a beige square.

No claim is made to the exclusive right to use the following apart from the mark as shown: "PARIS"

The name(s), portrait(s), and/or signature(s) shown in the mark does not identify a particular living individual.

SER. NO. 88-445,730, FILED 05-24-2019



*Katherine Kelly Vidal*  
Director of the United States  
Patent and Trademark Office



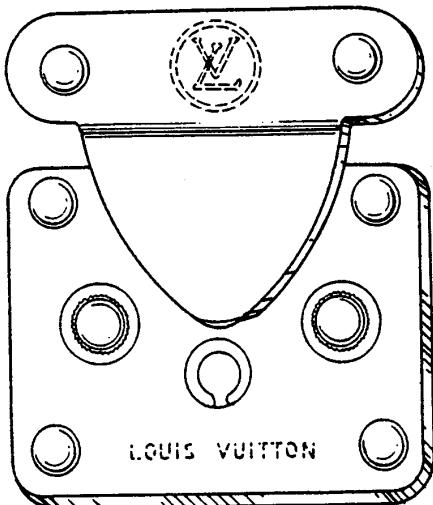
Int. Cl.: 18

Prior U.S. Cl.: 3

Reg. No. 1,650,162

**United States Patent and Trademark Office** Registered July 9, 1991

**TRADEMARK  
PRINCIPAL REGISTER**



LOUIS VUITTON (FRANCE CORPORATION)  
30 RUE LA BOETIE  
75008 PARIS, FRANCE

OWNER OF FRANCE REG. NO. 1506387,  
DATED 12-30-1988, EXPIRES 12-30-1998.

OWNER OF U.S. REG. NOS. 286,345, 1,574,197  
AND OTHERS.

THE MARK CONSISTS OF A SOLID BRASS  
LOCK COMPRISED OF A HASP WITH A  
RIVET ON EITHER SIDE, A LOCK PLATE  
WITH FOUR RIVETS, ONE ON EACH CORNER  
AND TWO RELEASE MECHANISMS, ONE ON  
EITHER SIDE OF THE POINT WHERE THE  
HASP ATTACHES TO THE LOCK PLATE AND  
A LOCK HOUSING.

SEC. 2(F).

SER. NO. 73-811,070, FILED 7-6-1989.

PATRICK HINES, EXAMINING ATTORNEY

FOR: LEATHER AND IMITATION LEATHER  
PRODUCTS, NAMELY TRAVELING BAGS,  
SETS AND TRUNKS, VALISES, SATCHELS,  
HAT BOXES AND SHOE BOXES USED FOR  
LUGGAGE, TRAVEL KITS AND VANITY  
CASES SOLD EMPTY AND USED FOR LUG-  
GAGE, RUCKSACKS, SHOPPING BAGS AND  
BEACH BAGS IN THE NATURE OF LUG-  
GAGE, HAND BAGS, BRIEFCASES, BRIEF-  
CASE-TYPE PORTFOLIOS, WALLETS, BILL-  
FOLDS, PASSPORT CASES, KEY CASES,  
CREDIT CARD CASES, BUSINESS CARD  
CASES AND CHANGE PURSES, IN CLASS 18  
(U.S. CL. 3).

**Int. Cls.: 9, 18 and 25**

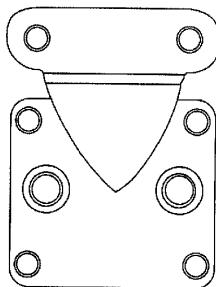
**Prior U.S. Cls.: 1, 2, 3, 21, 22, 23, 26, 36, 38, 39 and 41**

**Reg. No. 3,066,114**

**Registered Mar. 7, 2006**

**United States Patent and Trademark Office**

**TRADEMARK  
PRINCIPAL REGISTER**



LOUIS VUITTON MALLETIER (FRANCE SOCIÉTÉ ANONYME)  
2, RUE DU PONT-NEUF  
F-75001 PARIS  
FRANCE

FOR: SUNGLASSES, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FOR: LEATHER AND IMITATION LEATHER PRODUCTS, NAMELY, SHOULDER BAGS, HANDBAGS, ATTACHE CASES, DOCUMENT WALLETS AND BRIEFCASES OF LEATHER, AND PURSES, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FOR: CLOTHING, NAMELY, SHOES, BOOTS, AND SLIPPERS, IN CLASS 25 (U.S. CLS. 22 AND 39).

PRIORITY DATE OF 3-11-2004 IS CLAIMED.

OWNER OF INTERNATIONAL REGISTRATION  
0833274 DATED 8-13-2004, EXPIRES 8-13-2014.

OWNER OF U.S. REG. NOS. 1,650,162 AND  
2,828,919.

THE MARK CONSISTS OF THE SHAPE OF A CLASP MADE OF TWO PARTS, THE LOWER ONE BEING A SQUARE PLATE WITH ONE SMALL RIVET IN EACH OF THE FOUR CORNERS AND TWO BIGGER PUSH BUTTONS IN THE MIDDLE WHICH FUNCTION AS A RELEASE MECHANISM, AND THE UPPER ONE BEING A TRIANGULAR HASP WITH ONE SMALL RIVET IN EACH TOP CORNER.

SEC. 2(F).

SER. NO. 79-005,308, FILED 8-13-2004.

DANIEL BRODY, EXAMINING ATTORNEY

Int. Cl.: 18

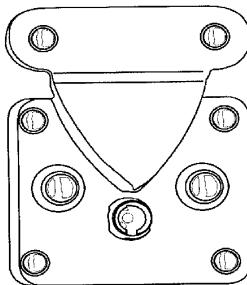
Prior U.S. Cls.: 1, 2, 3, 22 and 41

Reg. No. 3,617,909

United States Patent and Trademark Office

Registered May 12, 2009

TRADEMARK  
PRINCIPAL REGISTER



LOUIS VUITTON MALLETIER (FRANCE CORPORATION)  
2, RUE DU PONT-NEUF  
75001 PARIS, FRANCE

FOR: LEATHER AND IMITATION LEATHER PRODUCTS, NAMELY, TRAVEL TRUNKS, TRAVEL BAGS, TRAVEL CASES, TRAVEL GARMENT BAGS, SUITCASES, LUGGAGE, TOILETRY CASES SOLD EMPTY, BACK PACKS, HANDBAGS, BEACH BAGS, LEATHER SHOPPING BAGS, SHOULDER BAGS, ATTACHE CASES, BRIEFCASE-TYPE PORTFOLIO CASES, BRIEFCASES, SCHOOL BAGS, UNDERARM BAGS; MANUFACTURED LEATHER GOODS, NAMELY, WALLETS; UMBRELLAS, IN CLASS 18 (U.S. CLS. 1, 2, 3, 22 AND 41).

FIRST USE 1-1-1986; IN COMMERCE 1-1-1986.

OWNER OF U.S. REG. NOS. 1,650,162 AND 2,828,919.

THE MARK CONSISTS OF A SOLID BRASS LOCK COMPRISED OF A HASP WITH A RIVET ON EITHER SIDE, A LOCK PLATE WITH FOUR RIVETS, ONE ON EACH CORNER AND TWO RELEASE MECHANISMS, ONE ON EITHER SIDE OF THE POINT WHERE THE HASP ATTACHES TO THE LOCK PLATE AND A LOCK HOUSING.

SEC. 2(F).

SER. NO. 76-572,393, FILED 1-29-2004.

DANIEL CAPSHAW, EXAMINING ATTORNEY

# **Exhibit B**

Article published by a CNN Newssource dated August 19, 2021 entitled  
“Thousands of Designer Items Confiscated in Federal Search Warrant at Atlanta  
Discount Mall.”

<https://kyma.com/cnn-regional/2021/08/19/thousands-of-designer-items-confiscated-in-federal-search-warrant-at-atlanta-discount-mall/>

MENU



64°

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Published August 19, 2021 7:04 AM

# Thousands of designer items confiscated in federal search warrant at Atlanta discount mall

By JASMINA ALSTON

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ATLANTA, GA ([WGCL](#)) — Homeland Security Investigations, along with several other agencies, executed a federal search warrant at an Atlanta discount mall on Wednesday.

Agents pulled thousands of designer items, including Gucci bags and Chanel wallets, from inside Westgate Discount Mall on Campbellton Road.

A spokesperson for Homeland Security Investigations' Atlanta office didn't release many details on their investigation, an operation that Governor Brian Kemp also briefly appeared at.

## Trending Articles



MENU



64°



A blue street sign for "S Dora AV 1600" with a white arrow pointing left. The sign is mounted on a metal pole.

Attempted homicide suspect still at large - KYMA

1 comment



A photograph showing a memorial site with many colorful flowers and small crosses planted in the ground.

Two-year anniversary of migrant crash in Holtville - KY...

7 comments



A small, mostly blank image placeholder with a yellow border and a right-pointing arrow icon.

Bo...  
two...

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"At this time details are limited, but as we process this location and continue the operation we can provide more information," Lindsay Williams, with HSI-Atlanta public affairs, said.

Sources told CBS46's Jasmina Alston many of the items were counterfeit.

Graham Wetzbarger, CEO of Luxury Appraisals and Authentication, said the illegal sale of fake items is a bigger problem than most know.

"Selling counterfeit goods is illegal and some people look at a fake handbag as a victimless crime, but it really isn't," he said. "The same people that smuggle these goods into the country, are also smuggling other things, which is drugs, weapons and even people."

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